

1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE NORTHERN DISTRICT OF OHIO  
3           EASTERN DIVISION

4                   -   -   -

5  
6           IN RE:    NATIONAL                         :   HON. DAN A.  
7           PRESCRIPTION OPIATE                   :   POLSTER  
8           LITIGATION                             :  
9   :  
10          APPLIES TO ALL CASES                 :   NO.  
11   :   1:17-MD-2804  
12   :  
13   :

14                   - HIGHLY CONFIDENTIAL -

15           SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

16                   -   -   -

17                   November 28, 2018

18                   -   -   -

19                   Videotaped deposition of  
20           WILLIAM DE GUTIERREZ-MAHONEY, taken  
21           pursuant to notice, was held at the law  
22           offices of Covington & Burling, LLP, The  
23           New York Times Building, 620 Eighth  
24           Avenue, New York, New York, beginning at  
25           9:08 a.m., on the above date, before  
26           Michelle L. Gray, a Registered  
27           Professional Reporter, Certified  
28           Shorthand Reporter, Certified Realtime  
29           Reporter, and Notary Public.

30                   -   -   -

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19 Henry Marte

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# I N D E X

Testimony of:

WILLIAM DE GUTIERREZ-MAHONEY

By Mr. Bogle 20, 550

By Mr. Bowden 301

By Mr. Schmidt 483, 599

# E X H I B I T S

— — —

E X H I B I T S (Cont'd.)

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E X H I B I T S (Cont'd.)

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E X H I B I T S (Cont'd.)

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[illegible]

E X H I B I T S      (Cont'd.)

Country	Percentage of respondents who believe the U.S. should take more action to address climate change
United States	83%
United Kingdom	77%
France	75%
Germany	74%
Canada	73%
Spain	72%
Italy	71%
China	69%
India	68%
Mexico	60%
South Korea	60%

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E X H I B I T S (Cont'd.)

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11/11/2016

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Figure 1. The effect of the number of trials on the number of correct responses. The number of correct responses was significantly higher for the 10-trial condition than for the 5-trial condition.

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*Journal of Internal Medicine* 255: 105–112

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DEPOSITION SUPPORT INDEX

Direction to Witness Not to Answer

PAGE LINE

None.

Request for Production of Documents

PAGE LINE

None.

Stipulations

PAGE LINE

None.

Questions Marked

PAGE LINE

None.

1 THE VIDEOGRAPHER: We are  
2 now on the record. My name is  
3 Henry Marte, the videographer with  
4 Golkow Litigation Services.

5 Today's date is November 28,  
6 2018. And the time is 9:08 a.m.

7 This videotaped deposition  
8 is being held at Covington and  
9 Burling LLP, located at 620 Eighth  
10 Avenue, New York, New York, in the  
11 matter of National Prescription  
12 Opiate Litigation.

13 The deponent today is  
14 William de Gutierrez-Mahoney.

15 Counsel, please introduce  
16 themselves for the record, which  
17 after the court reporter will  
18 administer the oath to the  
19 witness.

20 MR. BOGLE: Brandon Bogle on  
21 behalf of plaintiffs.

22 MR. BOWDEN: Wes Bowden on  
23 behalf of plaintiffs.

24 MR. LIVINGSTON: Scott

1 Livingston on behalf of Defendant,  
2 HBC.

3 MR. RICARD: Paul Ricard on  
4 behalf of Prescription Supply.

5 MS. DURFEE: Laura Jane  
6 Durfee on behalf of Walmart.

7 MS. McNAMARA: Colleen  
8 McNamara, on behalf of Cardinal  
9 Health.

10 MS. CALLAS: Gretchen Callas  
11 on behalf of AmerisourceBergen.

12 MS. DORRIS: Lauren Dorris  
13 on behalf of McKesson.

14 MR. SCHMIDT: Paul Schmidt  
15 on behalf of McKesson.

16 And let me just say, if I  
17 may, I don't know what the prior  
18 practice has been, I meant to  
19 check this, but my understanding  
20 is that everyone in the room and  
21 everyone on the phone is  
22 subjective to the protective order  
23 and the deposition will be covered  
24 by the confidentiality provisions

1 of the protective order. But if  
2 that's not true as to anyone,  
3 please correct me.

4 MR. BOGLE: I think that's  
5 accurate.

6 MS. MUSKETT: Michelle, did  
7 you get Fox Rothschild.

8 MS. ONYEFORO: Lucy Onyeforo  
9 of Allegaert, Berger & Vogel is on  
10 the phone as well for Rochester  
11 Drug Corporation.

12 - - -

13 ... WILLIAM DE GUTIERREZ-MAHONEY,  
14 having been first duly sworn, was  
15 examined and testified as follows:

16 - - -

17 EXAMINATION

18 - - -

19 BY MR. BOGLE:

20 Q. Good morning, Mr. Mahoney.  
21 How are you doing?

22 A. Good morning. Good.

23 Q. My name is Brandon Bogle,  
24 I'm going to be asking you some questions

1       today.

2                       Just starting out for the  
3       record, can I get your full name, please?

4               A.       William de  
5       Gutierrez-Mahoney.

6               Q.       Okay. And have you ever had  
7       your deposition taken before?

8               A.       I've been deposed in other  
9       matters, but not with opioids.

10              Q.       Right. And I'm talking  
11       generally in this sense. So how many  
12       times have you been deposed in any sort  
13       of matter prior to today?

14              A.       Once. Once.

15              Q.       Once. What was the general  
16       subject matter in that deposition?

17              A.       It was -- it was a murder  
18       case, and the question was about chain of  
19       custody.

20              Q.       Okay. Were you testifying  
21       in some law enforcement capacity?

22              A.       It was a criminal case. And  
23       the state wanted to know if the product  
24       that had been used in the crime had come

1 from McKesson.

2 Q. Okay. So you were working  
3 for McKesson at that point in time?

4 A. Yes.

5 Q. Okay. So just to kind of  
6 refresh you a little bit on a deposition,  
7 just sort of the basics, I'm going to ask  
8 you some questions today. I'll do my  
9 very best to ask my question, give you  
10 every opportunity to answer before I ask  
11 my next question.

12 I'll also ask that even if  
13 you think you know where I'm going, if  
14 you can let me get my full question out  
15 there before you answer so that we don't  
16 step on each others' toes, I think that  
17 the court reporter will appreciate that.  
18 Is that fair?

19 A. Yes.

20 Q. Okay. And you can take a  
21 break whenever you want. It's not an  
22 endurance contest. Just tell myself or  
23 your own counsel here. The only thing I  
24 ask is if I've got a question pending, if

1     you could answer that question and we can  
2     break for whenever -- however you want.

3                     And the last thing is if you  
4     don't understand or don't hear something  
5     that I say, ask me to repeat or rephrase.  
6     I'll do my best to make it clear to you.  
7     But if you answer my question, I'm going  
8     to assume that you understood it. Is  
9     that fair?

10                    A.     Yes.

11                    Q.     Okay. Where are you  
12     currently employed?

13                    A.     At McKesson.

14                    Q.     Okay. And how long have you  
15     been with McKesson?

16                    A.     I've been with McKesson for  
17     17-plus years.

18                    Q.     Okay. So starting  
19     approximately 2001; is that right?

20                    A.     Yes.

21                    Q.     Okay. What was your job in  
22     2001 when you started, job title?

23                    A.     I joined McKesson as a  
24     business process manager.

1 Q. Was that at Lakeland?

2 A. Our facility in Florida at  
3 that time was in Tampa.

4 Q. Okay. How long did you have  
5 that position?

6 A. I think I had it between  
7 let's say one year and two years.

8 Q. Okay. What was your next  
9 job at McKesson after that?

10 A. It was assistant  
11 distribution center manager.

12 Q. Was it in the Tampa  
13 facility?

14 A. Yes.

15 Q. How long did you have that  
16 job? Just the years is fine.

17 A. Until '04.

18 Q. Okay. And beginning in '04,  
19 it's my understanding that you took the  
20 role as distribution center manager for  
21 the Lakeland facility; is that right?

22 A. Yes.

23 Q. Okay. And you held that  
24 position from 2004 until approximately



1 December 2007; is that right?

2 A. Yes.

3 Q. Beginning in January 2008  
4 you took over as director of regulatory  
5 affairs for the southeast region, fair?

6 A. Yes.

7 Q. Okay. Has that been your  
8 job title from January 2008 to the  
9 present?

10 A. Yes.

11 Q. Okay. Now, just so I  
12 understand, when we talk about the  
13 southeast region, can you give me a sense  
14 of what that encompasses, whether it be  
15 states or distribution centers or however  
16 that's divided out at McKesson.

17 A. Initially, I was responsible  
18 for six distribution centers, in  
19 Lakeland; Atlanta; Birmingham, Alabama;  
20 Memphis, Tennessee; Conroe, Texas; and  
21 Oklahoma City.

22 Q. Okay. And you said  
23 initially. So at some point in time, did  
24 that change?

1 A. Yes.

2 Q. When did that change?

3 A. We brought on another person  
4 in 2013. And at that point I was  
5 responsible for Birmingham, Lakeland, and  
6 Atlanta.

7 Q. Who is the person that was  
8 brought on in 2013?

9 A. Linda Martin. There's been  
10 a subsequent change too.

11 Q. Okay. What was that? First  
12 of all, when did that subsequent change  
13 occur?

14 A. I believe it happened in the  
15 middle of 2014.

16 Q. Okay. What changed?

17 A. Jerry Carmack joined. And  
18 he picked up Memphis and Birmingham.  
19 Linda moved to Texas and Oklahoma City,  
20 and I was responsible for Atlanta and  
21 Lakeland.

22 MR. SCHMIDT: And I  
23 apologize. I can appreciate if  
24 you were running something off the

1 screen. Do you have a copy of  
2 whatever you're running?

3 MR. BOGLE: I haven't marked  
4 anything yet. I'm not -- we can  
5 take that down. I haven't marked  
6 anything yet. It's not supposed  
7 to be on the screen yet. Yeah, we  
8 certainly will when we go through  
9 it.

10 MR. SCHMIDT: I understand.

11 BY MR. BOGLE:

12 Q. Okay. So I didn't catch the  
13 last part there. So I apologize. I'm  
14 going to repeat part of this so I  
15 understand. I want to know from your  
16 perspective in mid-2014, which facilities  
17 you were responsible for from a  
18 regulatory perspective?

19 A. From then on --

20 Q. Yes, sir.

21 A. -- I became responsible for  
22 Atlanta and Lakeland.

23 Q. Atlanta and Lakeland. Has  
24 that been true from mid-2014 to present?

1                   A.       Yes.

2                   Q.       Now, going back to the time  
3       that you were distribution center manager  
4       for Lakeland, would that have encompassed  
5       running the day-to-day operations for the  
6       distribution center?

7                   A.       Yes.

8                   Q.       Okay. And can you just give  
9       me a general sense, again, as a  
10      distribution center manager for Lakeland,  
11      what your general job responsibilities  
12      were?

13                  A.       I was responsible for hiring  
14      and enabling the distribution center to  
15      service its customer base. We would  
16      receive product from manufacturers, stock  
17      the shelves, and process orders in the  
18      evening for delivery the following day.

19                  Q.       Okay. And the time period  
20      that you had that role from '04 to '07,  
21      there would also have been  
22      responsibilities under the Controlled  
23      Substances Act that would have fallen  
24      within your purview, right?

1 A. Yes.

2 Q. Okay. That would include,  
3 for example, suspicious order monitoring  
4 for controlled substances, right?

5 A. Yes.

6 Q. Okay. And can you give me a  
7 sense of what your role during that time  
8 period would have been from that  
9 perspective of suspicious order  
10 monitoring?

[REDACTED]

Category	Percentage
All respondents	~85%
18-24	~75%
25-34	~65%
35-44	~55%
45+	~45%

11 just asking your recollection. So if you  
12 don't recall, that's fine.

13                    A.     Right.

14 Q. Okay. The Lakeland  
15 distribution center, we'll start with '04  
16 to '07 time frame, what -- geographically  
17 what states did that cover as far as a  
18 customer base?

19           A.       In '04, I think we covered  
20       actually some portions -- the geography  
21       that we covered moved between '04 and  
22       '06 --

23 Q. Okay.

24           A.       -- because of the Florida

1 pedigree law.

2 Q. Okay.

3 A. And the decision was made to  
4 basically make Lakeland the primary with  
5 only one -- one or two backups, vehicle  
6 for delivering -- acquiring and  
7 delivering pedigree product to conform  
8 with the Florida pedigree law.

9 Q. When you say pedigree  
10 product, I want to make sure that our  
11 jury understands what that means. What  
12 is a pedigree product?

13 A. Because of investigations  
14 which observed that there is companies or  
15 entities were counterfeiting product or  
16 repackaging it in a way that undermined  
17 its efficacy and whether it was safe for  
18 the public, Florida implemented the  
19 Florida pedigree law. And initially they  
20 chose 30 drugs that they viewed as being  
21 subject to diversion that way.

22 And they required a pedigree  
23 on who had bought the various  
24 transactions which took place between the

1 manufacturer and -- or actually the  
2 distributor who bought it from the  
3 manufacturer and the pharmacy or entity  
4 to which it was sold.

5 Q. Would it be fair to say that  
6 it's sort of similar to what you  
7 mentioned before in the respect that you  
8 testified before, sort of a chain of  
9 custody throughout the lifecycle of the  
10 product to establish at all times it was  
11 a legitimate product?

12 A. Right.

13 Q. Okay. And let me ask my  
14 other question maybe a different way.  
15 From 2004 to present, has the Lakeland  
16 distribution center serviced customers in  
17 the State of Florida?

18 A. Yes.

19 Q. Okay. You mentioned the  
20 term "diversion" in your answer just a  
21 minute ago. What do you understand the  
22 term "diversion" to mean?

23 A. Where a product is  
24 inappropriately taken out of the normal



1 supply chain. In this case, one of the  
2 modes was that customers would buy a  
3 product and then attempt to return  
4 altered or not pedigree product into the  
5 supply chain.

6 Q. Okay. And the concept of  
7 diversion is -- it can be broader than  
8 that, right?

9 A. Sure, sure.

10 Q. Okay. Are there any other  
11 examples of diversion that you can think  
12 of?

13 A. Yeah. There is -- I guess,  
14 not chain. There's diversion that used  
15 to take place between closed door  
16 pharmacies and independent retail  
17 pharmacies in which pricing which was  
18 offered to closed door pharmacies would  
19 be diverted into the normal chain of  
20 independent flow, at which it would be  
21 able to be sold for higher prices. That  
22 was something that the manufacturers  
23 really clamped down on.

24 And then there's diversion

1 of controlled substances.

2 Q. Okay. And the concept of  
3 diversion, as I read it, is sort of  
4 generally defined as the use of a drug  
5 for an illegitimate medical purpose. Do  
6 you think that's a fair general  
7 statement?

8 A. Particularly in the case of  
9 controls.

10 Q. Right. Is that a fair  
11 general statement for controlled  
12 substances?

13 A. Yes.

14 Q. Okay. So prior to taking on  
15 your role as director of regulatory  
16 affairs in 2008, did you have any prior  
17 experience working in a regulatory  
18 capacity for any company?

19 A. No.

█ █ █ █  
█ █  
█ █  
█ █ █  
█ █

■ [REDACTED] [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]

5 Q. Okay. And you said CSA.  
6 And, again, I just want to make sure  
7 we're clear on what everything means  
8 here. That's the Controlled Substance  
9 Act?

10 A. Yes, sir.

11 Q. Okay. I saw a reference  
12 somewhere to you previously working for  
13 Cardinal Health; is that right?

14 A. I worked -- yes.

15 Q. Okay. What period of time  
16 did you work there?

17 A. I worked for Cardinal from  
18 March of '98 to the summer of 2000.

19 Q. Okay. What did you do  
20 generally for Cardinal?

21 First of all, what was your  
22 job title? Let's start there.

23 A. Job title was director of  
24 operations.

1 Q. Was that for a distribution  
2 center?

3                    A.        Yes.

4 Q. Where?

5                   A.       In Lakeland.

6 Q. Okay. Were your job  
7 responsibilities similar there to what  
8 they were at McKesson when you were  
9 distribution center manager?

10                    A.        Yes.

11 Q. Okay. You worked for --  
12 did -- had you worked for any other  
13 pharmaceutical distributors prior to  
14 working for Cardinal?

15                      A.                  No.

16 Q. And McKesson is a  
17 distributor of pharmaceutical products,  
18 right?

19                    A.        Yes.

Country	Percentage of respondents
Spain	85%
France	75%
Germany	65%
Italy	60%
United Kingdom	55%

█ [REDACTED]

█ [REDACTED] █ [REDACTED]

3 Q. And obviously the deposition  
4 today is going to focus largely on opioid  
5 products. You understand that, right?

6 A. Yes.

7 Q. That's what we're here to  
8 talk about?

9 A. Yes.

10 Q. And you are familiar with  
11 opioids, right?

12 A. Yes.

13 Q. Okay. And McKesson has  
14 distributed opioids during the time that  
15 you've worked with the company, right?

16 A. Yes.

17 Q. And opioids are a controlled  
18 substance, right?

19 A. Yes.

20 Q. And opioids are -- fall into  
21 the category of a narcotic drug, right?

22 A. Yes.

█ [REDACTED] █ [REDACTED]

█ [REDACTED] [REDACTED]

[illegible]

[illegible]

[REDACTED]

20 MR. SCHMIDT: Objection.

21 Foundation.

22 BY MR. BOGLE:

23 Q. You can still answer unless

24 he tells you not to answer.



1 A. Okay. Can you repeat that?

2 Q. Sure, I can.

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

8 MR. SCHMIDT: Same

9 objection.

█

[REDACTED]

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

[REDACTED]

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

[REDACTED]

█

[REDACTED]

█

[REDACTED]

[illegible]

■

■

■

2

MR. SCHMIDT: Objection.

3

Form.

4

(Document marked for

5

identification as Exhibit

6

MCK-Mahoney-1)

7

BY MR. BOGLE:

8

Q. Okay. I'm going to hand you

9

what's marked as Exhibit 1.1464. Also

10

marked as Exhibit 1 to your deposition.

11

And the beginning Bates number is

12

MCK\_MDL\_00478906.

13

Here's your copy. And this

14

is a long table, sir, so I'm not trying

15

to throw stuff at you, I swear.

16

Okay. So looking at

17

Exhibit 1 here. Let me introduce it and

18

then I want to ask you some questions

19

about it.

20

Do you see this is a letter

21

from the U.S. Department of Justice Drug

22

Enforcement Administration dated

23

September 27, 2006. Do you see that?

24

A. Yes.

1 Q. Okay. Have you seen this  
2 letter before today?

3 A. Yes.

4 Q. Okay. Did you see it in and  
5 around 2006?

6 A. Yes.

7 Q. Okay. How was it -- how did  
8 you come to see it in and around 2006?

9 A. It may have been addressed  
10 to me at the DC. But I also saw it via  
11 e-mail internally.

12 Q. Okay. All right. So I want  
13 to discuss a few portions of this letter.

14 The first paragraph there  
15 says, "This letter is being sent to every  
16 commercial entity in the United States  
17 registered with the Drug Enforcement  
18 Administration to distribute controlled  
19 substances. The purpose of this letter  
20 is to reiterate the responsibilities of  
21 controlled substance distributors in view  
22 of the prescription drug abuse problem  
23 our nation currently faces."

24 Do you see that?

1 A. Yes.

2 Q. Okay. And McKesson in 2006  
3 was registered with the DEA to distribute  
4 controlled substances, right?

5 A. Yes.

6 Q. And if you go down to the  
7 third paragraph on the first page. And  
8 I'm in the -- let's start with the first  
9 sentence. It says, "The CSA was designed  
10 by Congress to combat diversion by  
11 providing for a closed system of drug  
12 distribution in which all legitimate  
13 handlers of controlled substances must  
14 obtain a DEA registration, and as a  
15 condition of maintaining such  
16 registration, must take reasonable steps  
17 to ensure that their registration's not  
18 being utilized as a source of diversion.  
19 Distributors are, of course, one of the  
20 key components of the distribution chain.  
21 If the closed system is to function  
22 properly as Congress envisioned,  
23 distributors must be vigilant in deciding  
24 whether a prospective customer can be

1       trusted to deliver controlled substances  
2       only for lawful purposes."

3                       Did I read that correctly?

4               A.       Yes.

5               Q.       Okay.  There's a reference  
6       here to a closed system in this regard.  
7       What do you understand a closed system to  
8       mean?

9               A.       A closed system is a system  
10       in which the -- the drugs are initiated  
11       at a manufacturer, usually acquired by  
12       distributor.  Could be sent to another  
13       distributor, or to a pharmacy.

14                      The prescription is  
15       initiated with the -- the doctor.  And  
16       the distributor delivers the drugs to the  
17       pharmacy, and the pharmacy fills scripts  
18       which are initiated by the doctor.

19               Q.       And in a closed system in --  
20       in the concept of controlled substances  
21       means that essentially you have to have  
22       this DEA registration in order to be able  
23       to prescribe or distribute or manufacture  
24       controlled substances, right?

1 A. Yes.

2 Q. Okay. Okay. Look at the  
3 next sentence here. It says, "This  
4 responsibility is critical as Congress  
5 has expressly declared that the illegal  
6 distribution of controlled substances has  
7 a substantial and detrimental effect on  
8 the health and general welfare of the  
9 American people."

10 Do you see that?

11 A. Yes.

12 Q. Do you agree with that  
13 sentence?

14 MR. SCHMIDT: Objection.  
15 Foundation.

16 THE WITNESS: Yes.

17 BY MR. BOGLE:

18 Q. And turning to the second  
19 page of this document, one more section  
20 that I wanted to look at with you.

21 You see in the middle of the  
22 page there where it says the DEA  
23 regulations require? Do you see that?

24 A. Yes.

1                   Q.       It says, "The DEA  
2       regulations require all distributors to  
3       report suspicious orders of controlled  
4       substances. Specifically the regulations  
5       state in 21 C.F.R. 1301.74(b), "The  
6       registrant shall design and operate a  
7       system to disclose to the registrant  
8       suspicious orders of controlled  
9       substances. The registrant shall inform  
10      the field division office of the  
11      administration in his area of suspicious  
12      orders when discovered by the registrant.  
13      Suspicious orders include orders of  
14      unusual size, orders deviating  
15      substantially from a normal pattern, and  
16      orders of unusual frequency."

17                               Do you see that?

18                   A.       Yes.

19                   Q.       And that paragraph I just  
20      read that's from the C.F.R., that's a  
21      paragraph that you're familiar with,  
22      right?

23                   A.       Yes.

24                   Q.       And then it goes on to say,



1 "It bears emphasis that the foregoing  
2 reporting requirement is in addition to,  
3 and not in lieu of, the general  
4 requirement under 21 U.S.C. 823(e) that a  
5 distributor maintain effective controls  
6 against diversion. Thus, in addition to  
7 reporting all suspicious orders, a  
8 distributor has statutory responsibility  
9 to exercise due diligence to avoid  
10 filling suspicious orders that might be  
11 diverted into other than a legitimate  
12 medical, scientific, and industrial  
13 channels."

14 Do you see that?

15 A. Yes.

16 Q. And these -- this additional  
17 duty to avoid filling here, that's what  
18 we talked about earlier which is the duty  
19 to block suspicious orders when they're  
20 detected, right?

21 A. Yes.

22 Q. Okay. And would you agree  
23 that reporting suspicious orders to the  
24 DEA is important because it allows the



■ [REDACTED]  
■ [REDACTED]

3 Q. Okay. So do you have a  
4 sense as to whether -- actually, strike  
5 that.

6 Would you agree with me that  
7 blocking a suspicious order is important  
8 because it ensures that potential  
9 diversion does not occur with that order?

10 MR. SCHMIDT: Same  
11 objection. Foundation.

12 THE WITNESS: That's the  
13 intent, yes.

14 BY MR. BOGLE:

15 Q. Okay. And diversion of  
16 controlled substances, including opioids  
17 can be prevented by compliance with the  
18 Controlled Substance Act, right?

19 MR. SCHMIDT: Same  
20 objection.

21 THE WITNESS: I think there  
22 are a lot of different  
23 participants. And even if  
24 Controlled Substance Act is

1           complied with by a majority of the  
2           participants, diversion can still  
3           occur.

4 BY MR. BOGLE:

5 Q. Okay. So you would not  
6 agree then that diversion of opioids  
7 specifically can be prevented through  
8 compliance with the Controlled Substance  
9 Act?

10 MR. SCHMIDT: Same  
11 objection.

12 THE WITNESS: Are you  
13 talking about relative to  
14 distributors?

15 BY MR. BOGLE:

16 Q. Yeah. We can start there.

17           A.       Okay.   Can you repeat the  
18   question?

Response	Percentage
U.S. should take action	85%
U.S. should not take action	15%

1 Q. Okay. Do you agree that  
2 there is an ongoing opioid epidemic in  
3 the United States?

4 A. Yes.

5 Q. And that epidemic has been  
6 going on for more than a decade in this  
7 country, right?

8 MR. SCHMIDT: Objection.  
9 Foundation.

10 THE WITNESS: I'm not sure  
11 exactly when it began.

12 BY MR. BOGLE:

[REDACTED]

[illegible]

21     opioid overdoses are the leading cause of  
22     injury-related death in the United  
23     States?

24                   A.       I'm not sure about that.

1 Q. Okay.

2 A. I've heard that for  
3 different age groups and that kind of  
4 thing. But I'm not sure.

5 Q. Okay. Why don't we take a  
6 look at something here with you on that  
7 point. I'm going to hand you 1.264,  
8 which is marked as Exhibit 2.

9 (Document marked for  
10 identification as Exhibit  
11 MCK-Mahoney-2.)

12 BY MR. BOGLE:

13 Q. This is a public document.  
14 So no Bates numbers.

15 MR. SCHMIDT: You can throw  
16 it. I know you're not being rude.  
17 It's a big table.

18 BY MR. BOGLE:

19 Q. Okay. Mr. Mahoney, what  
20 I've handed you -- here again, I'll  
21 introduce it, and we'll kind of go from  
22 there -- is a document from May 4, 2018,  
23 from the U.S. House of Representatives  
24 Committee on Energy and Commerce.

1 Do you see that?

2 A. Mm-hmm.

3 Q. Okay. Have you seen this  
4 document before?

5 A. I don't think I've seen this  
6 document.

7 Q. Okay. Do you see that the  
8 line at the top notes, "Regarding hearing  
9 entitled 'Combatting the Opioid Epidemic:  
10 Examining Concerns About Distribution and  
11 Diversion.'" "

12 Do you see that?

13 A. Yes.

14 Q. Okay. And if you look here,  
15 on that first page, there's a section  
16 that lists witnesses for the hearing.

17 A. Yes.

18 Q. Do you see that section?

19 A. Mm-hmm.

20 Q. And you see the third person  
21 listed there is a John H. Hammergren --

22 A. Yes.

23 Q. -- president and CEO of  
24 McKesson. Do you see that?



1                   A.       Mm-hmm.

2                   Q.       Okay. And you are familiar  
3 with Mr. Hammergren, right?

4                   A.       Yes.

5                   Q.       Okay. I mean, you know who  
6 he is, right?

7                   A.       Yeah.

8                   Q.       Okay. Were you aware that  
9 he testified before Congress in 2018?

10                  A.       Yes.

11                  Q.       Yes. What information were  
12 you provided about his testimony?

13                  A.       I believe I watched it.

14                  Q.       Okay. So you did watch at  
15 least portions of this hearing that we're  
16 talking about here?

17                  A.       Yes.

18                  Q.       Okay. So going to the  
19 second page of this document, and I'm  
20 looking at the paragraph below the chart  
21 that says, "The U.S. continues."

22                  A.       Okay.

23                  Q.       Do you see that?

24                            It says, "The U.S. continues

1 to experience an opioid epidemic which  
2 has worsened over the last two decades.  
3 Opioid-involved overdose deaths are the  
4 leading cause of injury death in the U.S.  
5 and take the lives of 115 Americans per  
6 day. According to a recent report issued  
7 by the Centers For Disease Control and  
8 Prevention, CDC, prescription or illicit  
9 opioids were involved in nearly  
10 two-thirds of all drug overdose deaths in  
11 the U.S. during 2016, a 27.7 percent  
12 increase from 2015.

13 "In total, more than 351,000  
14 people have died since 1999 due to an  
15 opioid-involved overdose. The crisis has  
16 become so severe that the average life  
17 expectancy declined in 2016 from the  
18 previous year largely because of opioid  
19 overdoses."

20 Do you see that there?

21 A. Yes.

22 Q. Okay. Prior to looking at  
23 this today, were you aware that the life  
24 expectancy, at least in 2016, had

1 declined largely because of opioid  
2 overdoses?

3 MR. SCHMIDT: Objection.  
4 Foundation.

5 THE WITNESS: I had heard  
6 that life expectancy had gone  
7 down. But I hadn't attributed it  
8 necessarily to just opioids.

9 Suicide, depression. There  
10 were a lot of different things in  
11 what I had seen.

12 BY MR. BOGLE:

13 Q. Okay. But you've never seen  
14 the reference similar to the one here  
15 that decline, at least from 2016 versus  
16 2015, was largely because of opioid  
17 overdoses?

18 A. I hadn't seen that sentence,  
19 no.

20 Q. Any reason to dispute that  
21 finding?

22 A. No.

23 MR. SCHMIDT: Same  
24 objection.

1 BY MR. BOGLE:

2 Q. We talked a little bit  
3 earlier about your involvement at the  
4 Lakeland distribution center, initially  
5 as the assistant distribution center  
6 manager -- I think that was the title  
7 that you gave me -- then distribution  
8 center manager, and then as director of  
9 regulatory affairs responsible for  
10 Lakeland. We talked about that earlier,  
11 right?

12 A. Yes.

13 Q. Okay. So Florida -- let me  
14 back up. Strike that.

15 Do you live in Florida?

16 A. I do.

17 Q. Okay. How long have you  
18 lived in Florida?

19 A. About 20 years.

20 Q. Okay. So being a Florida  
21 resident in addition to being an employee  
22 of McKesson in the capacities that we've  
23 discussed, you understand that Florida  
24 has been hit very hard by the opioid

1 epidemic, correct?

2 A. Yes.

3 Q. Are you familiar with Gary  
4 Boggs at McKesson?

5 A. Yes, mm-hmm.

6 Q. Did you know him in any  
7 capacity prior to him joining the  
8 company?

9 A. I may have met him before.  
10 But I didn't know him.

11 Q. Okay. You do know that he  
12 was with the DEA prior to joining  
13 McKesson, right?

14 A. Yes.

15 Q. And he works in the  
16 regulatory affairs department at McKesson  
17 presently, right?

18 A. Yes.

19 Q. And has for the past five  
20 years or so, right?

21 A. Yes.

22 (Document marked for  
23 identification as Exhibit  
24 MCK-Mahoney-3.)

1 BY MR. BOGLE:

2 Q. I'm going to hand you what  
3 I'm marking Exhibit 1.851, also marked as  
4 Exhibit 3.

5 MR. SCHMIDT: Bill, when  
6 you're done with the exhibits,  
7 I'll just put them here. If we  
8 need to go back to any earlier  
9 ones --

10 MR. BOGLE: Yeah, we may  
11 bounce a little back and forth.  
12 But --

13 MR. SCHMIDT: I'll help you  
14 with that, which should be  
15 terrifying to everyone in the  
16 room. I'll do my best.

17 BY MR. BOGLE:

18 Q. All right. So Exhibit 3  
19 here, also marked as 1.851, is a

20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]

23 Do you see that?

24 A. Yes.

[illegible]

1 A. Mm-hmm.

2 Q. Is that a yes?

3 A. Yes.

4 Q. I'm sorry, I'm not trying to  
5 be rude, just want to make sure --

6 A. No, I understand --  
7 understand.

8 Q. The concept of a pill mill,  
9 what does that mean to you?

10 A. The way I envision the pill  
11 mill is a doctor, doctor or doctor's  
12 office, in which people are seeing the  
13 doctor and getting opioids on the way  
14 out.

15 Q. Okay.

16 A. So from my exposure or  
17 things that I've seen, it would be a high  
18 volume-type operation.

19 Q. Okay. In the term "pill  
20 mill" as used generally in -- strike  
21 that.

22 The term "pill mill" when  
23 you are talking about the sales of  
24 controlled substances is -- has a



<sup>1</sup> negative connotation to it, right?

2                    A.        Yes.

Age Group	Percentage
18-24	10%
25-34	15%
35-44	20%
45-54	25%
55-64	30%
65-74	35%
75+	40%

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Age Group	Percentage
18-24	10%
25-34	20%
35-44	30%
45-54	25%
55-64	15%
65-74	10%
75-84	5%
85+	5%

10 Q. Okay. What is DU, do you  
11 know what that stands for?

12 A. Dosage units.

Age Group	Percentage
18-24	10%
25-34	15%
35-44	20%
45-54	25%
55-64	30%
65-74	35%
75-84	40%
85+	45%

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

[illegible]

Age Group	Percentage
18-24	10%
25-34	20%
35-44	25%
45-54	20%
55-64	15%
65-74	10%
75-84	5%
85+	5%

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

[REDACTED]

[REDACTED]

3 MR. SCHMIDT: Objection.

4 Foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

A horizontal bar chart with 25 rows. Each row has a small square icon on the left, followed by a text label, and then a horizontal bar representing a percentage. The bars are gray. The categories and their approximate percentages are as follows:

Category	Percentage
1. All respondents	100%
2. Respondents who have been in the U.S. for 10 years or more	75%
3. Respondents who have been in the U.S. for 5 years or more	90%
4. Respondents who have been in the U.S. for 1 year or more	95%
5. Respondents who have been in the U.S. for less than 1 year	25%
6. Respondents who are U.S. citizens	25%
7. Respondents who are U.S. permanent residents	75%
8. Respondents who are temporary lawful permanent residents	25%
9. Respondents who are temporary lawful permanent residents	25%
10. Respondents who are temporary lawful permanent residents	75%
11. Respondents who are temporary lawful permanent residents	90%
12. Respondents who are temporary lawful permanent residents	95%
13. Respondents who are temporary lawful permanent residents	95%
14. Respondents who are temporary lawful permanent residents	90%
15. Respondents who are temporary lawful permanent residents	95%
16. Respondents who are temporary lawful permanent residents	95%
17. Respondents who are temporary lawful permanent residents	95%
18. Respondents who are temporary lawful permanent residents	95%
19. Respondents who are temporary lawful permanent residents	95%
20. Respondents who are temporary lawful permanent residents	95%
21. Respondents who are temporary lawful permanent residents	95%
22. Respondents who are temporary lawful permanent residents	95%
23. Respondents who are temporary lawful permanent residents	95%
24. Respondents who are temporary lawful permanent residents	95%
25. Respondents who are temporary lawful permanent residents	95%

[REDACTED]

[REDACTED]

[REDACTED]

2

Q. And you've seen that

3

reference before today, right?

4

A. I believe so.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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11/11/2016



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MR. SCHMIDT: Objection.

Vague.

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11/11/2016

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1 [REDACTED]  
2 (Document marked for  
3 identification as Exhibit  
4 MCK-Mahoney-4.)

5 BY MR. BOGLE:

6 Q. I'm going to hand you next  
7 what I'm marking as Exhibit 1.1968, also  
8 marked as Exhibit 4 to your deposition.

9 And the start date here is  
10 MCK\_MDL\_00651331.

11 Okay. So what I've given  
12 you here is Exhibit 4. The title is

13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]

20 Q. Okay. And before we get  
21 into it, I have a few questions about it,  
22 but before we get there, ISMC, what does  
23 that stand for at McKesson?

24 A. Independent and small and





[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9 MR. SCHMIDT: Objection.

10 Foundation.

[REDACTED]

[REDACTED]

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[illegible]

[illegible]

10 MR. SCHMIDT: Let me just  
11 say, I think there was an issue in  
12 one of the earlier depositions  
13 about geographic focus  
14 restriction. We're, I think, well  
15 outside of it with Florida. I'd  
16 ask you to kind of focus on what's  
17 at issue geographically. And if  
18 not, we'll obviously preserve our  
19 objection and maybe seek relief on  
20 that basis.

21 MR. BOGLE: Yeah, I mean,  
22 you're certainly entitled to  
23 object, but there's no geographic  
24 restrictions as to what I can ask.

1 I'm aware of nothing of the sort.

2 MR. SCHMIDT: I don't think  
3 we understand that in that way in  
4 terms of the judge ordering -- the  
5 special master ordering that  
6 discovery should be focused on the  
7 jurisdictions that would be  
8 subject to the first trial.

9 BY MR. BOGLE:

10 Q. My question stands. Do you  
11 recall my question?

12 A. Can you repeat it, please?

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A horizontal bar chart with 20 rows. Each row has a small square marker on the left and a corresponding horizontal bar. The bars vary in length and position, representing different percentages. The bars are gray, and the background is white. The chart is enclosed in a black border.

Category	Percentage
1	65%
2	85%
3	85%
4	55%
5	80%
6	75%
7	45%
8	90%
9	65%
10	25%
11	90%
12	90%
13	75%
14	95%
15	90%
16	25%
17	90%
18	80%
19	85%
20	95%
21	40%
22	25%
23	80%
24	90%
25	85%

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5 MR. SCHMIDT: Objection.  
6 Foundation.

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19 Q. Okay. And Florida  
20 specifically, is it your understanding,  
21 has historically had one of the highest  
22 rates of diversion of opioids in the  
23 country?

24 A. Let me see. Historically?



1 Q. Yeah. So, well let me ask  
2 you. Here, we'll just look at the  
3 document. We'll cut to it.

4 (Document marked for  
5 identification as Exhibit  
6 MCK-Mahoney-5.)

7 BY MR. BOGLE:

8 Q. I'll hand you what's marked  
9 as Exhibit 1.1434, also marked as  
10 Exhibit 5, and start with Bates  
11 MCKMDL00403517.

12 That's as far as I can get  
13 it.

14 Okay. We'll start with the

[REDACTED]

[illegible]

A horizontal bar chart with 25 rows. Each row contains a small gray square on the left, followed by a gray bar of varying length. The bars are distributed across the width of the chart, with some starting at the left edge and others starting at different positions. The bars vary in length, with some being very short and others nearly spanning the entire width of the chart area.

[REDACTED]

8 Q. Are you familiar with the  
9 concept known as migration when it comes  
10 to controlled substances?

11 MR. SCHMIDT: Objection.  
12 Vague.

13 THE WITNESS: I have -- I'm  
14 not sure.

15 BY MR. BOGLE:

16 Q. Okay. Not sure if you ever  
17 heard that term used in the context of  
18 controlled substances?

19 A. I may have heard about it in  
20 various modes or forms.

21 Q. Okay. Do you have any sense  
22 of what that means, again focused on  
23 controlled substances?

24 A. I think that one of the

1 things, for example, that was seen was  
2 that as the states were doing their part  
3 to fight the system, they were making  
4 more tools available to doctors and  
5 pharmacists that they could track what  
6 their patients were doing.

7 So state by state, they were  
8 implementing prescription monitoring  
9 programs. And some states were early to  
10 embrace them, and some were later.

11 And I think that one of the  
12 things that was observed was that that  
13 was a strong tool that caused abuse to  
14 move to states that did not have those  
15 kinds of systems.

16 So as they were  
17 implemented -- and I don't know when the  
18 first one was implemented. But they may  
19 have moved from states where they were  
20 implemented. Maybe Kentucky and Ohio  
21 were among the early ones. And abuse  
22 moved to states where there were less --  
23 less strong monitoring programs.

24 Q. Okay. Have you heard of the

1     concept of migration used in the sense of  
2     when controlled substances or even  
3     illegal -- applies equally to illegal  
4     drugs -- are supplied to a market,  
5     oversupplied to a market, when that  
6     market is oversupplied, the excess will  
7     tend to migrate somewhere else?

8                     MR. SCHMIDT:  Objection.  
9                     Vague.

10    BY MR. BOGLE:

11                    Q.     Are you familiar with that  
12    kind of concept, migration?

13                    A.     I can understand --

14                    MR. SCHMIDT:  Same  
15    objection.

16                    Go ahead.

17                    THE WITNESS:  I understand  
18    what you're saying.

19    BY MR. BOGLE:

20                    Q.     Okay.  Does that make sense  
21    to you?

22                    MR. SCHMIDT:  Same  
23    objection.  Vague.

24                    THE WITNESS:  It sounds like



[illegible]



1 Do you see that?

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19 MR. BOGLE: This is a decent  
20 breaking point if you don't mind.  
21 Quick break, I'll reset my  
22 documents.

23 MR. SCHMIDT: Okay.

24 THE VIDEOGRAPHER: Remove



[REDACTED]

21 Q. I'm going to hand you what  
22 I'm marking as Exhibit 1.1946, also  
23 marked as Exhibit 7 to your deposition.  
24 (Document marked for



[illegible]

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15 MR. SCHMIDT: Object to  
16 characterization.

[REDACTED]

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A 20x20 grid of gray squares on a white background, representing a sparse matrix. The squares are distributed across the grid, with some appearing in single cells and others in small groups, indicating non-zero entries in a matrix.

23 MR. SCHMIDT: Objection.

24 Just a second. Sorry.

Objection.      Foundation.

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MR. SCHMIDT: Objection.

Foundation.

BY MR. BOGLE:

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The diagram consists of 20 horizontal bars of varying lengths and positions, arranged in a sequence from top to bottom. The bars are colored in a light gray color. The sequence of bars is as follows:

- Bar 1: Starts at the left edge, ends at approximately 30% width.
- Bar 2: Starts at approximately 40% width, ends at approximately 95% width.
- Bar 3: Starts at the left edge, ends at approximately 98% width.
- Bar 4: Starts at the left edge, ends at approximately 95% width.
- Bar 5: Starts at approximately 40% width, ends at approximately 98% width.
- Bar 6: Starts at approximately 25% width, ends at approximately 45% width.
- Bar 7: Starts at approximately 25% width, ends at approximately 48% width.
- Bar 8: Starts at approximately 53% width, ends at approximately 100% width.
- Bar 9: Starts at the left edge, ends at approximately 98% width.
- Bar 10: Starts at the left edge, ends at approximately 100% width.
- Bar 11: Starts at the left edge, ends at approximately 90% width.
- Bar 12: Starts at the left edge, ends at approximately 78% width.
- Bar 13: Starts at the left edge, ends at approximately 38% width.
- Bar 14: Starts at approximately 40% width, ends at approximately 95% width.
- Bar 15: Starts at approximately 25% width, ends at approximately 45% width.
- Bar 16: Starts at approximately 25% width, ends at approximately 48% width.
- Bar 17: Starts at approximately 53% width, ends at approximately 100% width.
- Bar 18: Starts at the left edge, ends at approximately 98% width.
- Bar 19: Starts at the left edge, ends at approximately 100% width.
- Bar 20: Starts at the left edge, ends at approximately 100% width.
- Bar 21: Starts at the left edge, ends at approximately 45% width.
- Bar 22: Starts at approximately 25% width, ends at approximately 45% width.

21 MR. SCHMIDT: Object to the  
22 characterization. You've got to  
23 give me just a second to lodge an  
24 objection.



[illegible]

[illegible]

Row	Bar Length (approx. %)
1	15
2	85
3	95
4	90
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6	95
7	80
8	95
9	90
10	85
11	20
12	15
13	20
14	20
15	20
16	20
17	80
18	90
19	95
20	90
21	45
22	20
23	20

22 MR. SCHMIDT: Object to the  
23 characterization.  
24 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 MR. SCHMIDT: Objection.

9 Characterization.

[REDACTED]

[REDACTED]

[REDACTED]

13 BY MR. BOGLE:

14 Q. Okay. I'm going to hand you  
15 what I'm marking as 1.1789. Also marked  
16 as Exhibit 8.

17 Start Bates Number is  
18 MCK\_MDL\_00496876.

19 (Document marked for  
20 identification as Exhibit  
21 MCK-Mahoney-8.)

22 BY MR. BOGLE:

[REDACTED]

[REDACTED]



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The diagram consists of 20 horizontal gray bars stacked vertically. The bars vary in their starting and ending horizontal positions, creating a stepped or irregular profile. The bars are numbered 1 through 20 from top to bottom. The overall shape suggests a sequence of events or data points over time, where the horizontal extent of each bar represents a duration or range.

A horizontal bar chart consisting of 20 rows. Each row features a small square on the left side, followed by a gray bar. The bars vary in their starting and ending positions relative to the chart's width. The first bar starts at the left edge and ends at approximately 90%. The second bar starts at the left edge and ends at approximately 95%. The third bar starts at the left edge and ends at approximately 30%. The fourth bar starts at approximately 25% and ends at approximately 95%. The fifth bar starts at the left edge and ends at approximately 50%. The sixth bar starts at approximately 25% and ends at approximately 95%. The seventh bar starts at approximately 35% and ends at approximately 90%. The eighth bar starts at the left edge and ends at approximately 95%. The ninth bar starts at the left edge and ends at 100%. The tenth bar starts at the left edge and ends at approximately 60%. The eleventh bar starts at approximately 25% and ends at approximately 50%. The twelfth bar starts at approximately 25% and ends at approximately 75%. The thirteenth bar starts at the left edge and ends at approximately 90%. The fourteenth bar starts at approximately 10% and ends at approximately 95%. The fifteenth bar starts at the left edge and ends at approximately 35%. The sixteenth bar starts at approximately 35% and ends at 100%. The seventeenth bar starts at the left edge and ends at approximately 55%. The eighteenth bar starts at approximately 35% and ends at approximately 70%. The nineteenth bar starts at approximately 25% and ends at approximately 45%. The twentieth bar starts at approximately 25% and ends at 100%. The twenty-first bar starts at the left edge and ends at approximately 95%. The twenty-second bar starts at the left edge and ends at 100%. The twenty-third bar starts at the left edge and ends at approximately 40%.



1 objection.

[REDACTED]

11 MR. SCHMIDT: Objection.

12 Foundation.

[REDACTED]

[illegible]



The diagram consists of 20 horizontal bars arranged in a staggered sequence. The bars are colored in a light gray shade. The sequence starts with a short bar on the left, followed by a slightly longer bar, and then a much longer bar. This is followed by a bar of medium length, then a bar that starts further to the right and is of medium length. The sequence continues with bars of varying lengths and starting positions, some starting at the left edge and others starting further to the right. The bars are arranged in a way that suggests a timeline or a sequence of events.



Category	Percentage
Top 10	100%
Bottom 10	100%
Other	100%

1			
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98			
99			
100			

Category	Percentage
1	100%
2	85%
3	100%
4	85%
5	100%
6	95%
7	45%
8	15%
9	15%
10	15%
11	15%
12	15%
13	15%
14	15%
15	15%
16	15%
17	15%
18	15%
19	15%
20	15%
21	15%
22	15%
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98	15%
99	15%
100	15%

■	[REDACTED]	[REDACTED]
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■	■	[REDACTED]
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■	[REDACTED]	
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■	[REDACTED]	
■	■	[REDACTED]
■	■	[REDACTED]
■	[REDACTED]	
■	[REDACTED]	
■	[REDACTED]	
■	[REDACTED]	
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■	■	[REDACTED]
■	■	[REDACTED]
■	■	[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 (Document marked for  
9 identification as Exhibit  
10 MCK-Mahoney-9.)

11 BY MR. BOGLE:

12 Q. I'm going to hand you what  
13 I'm marking as Exhibit 1.1963, also  
14 marked as Exhibit 9. Bates Number  
15 MCKMDL00571360.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

■	[REDACTED]		
■		■	■
■		■	■ [REDACTED]
■	[REDACTED]		
■	[REDACTED]		[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■			[REDACTED]
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■		■	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		■
■	[REDACTED]		
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■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■			[REDACTED]
■		■	■
■		■	[REDACTED]

Row	Bar Length (approx. % of total width)
1	95
2	90
3	95
4	88
5	88
6	30
7	100
8	55
9	55
10	95
11	50
12	100
13	50
14	50
15	95

14 MR. SCHMIDT: Objection.

15 Foundation.

[illegible]



[illegible]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

10 MR. SCHMIDT: Objection.

11 Foundation.

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15 I'm going to hand you what  
16 I'm marking as Exhibit 1.1943, which is  
17 also Exhibit 10.

18 (Document marked for  
19 identification as Exhibit  
20 MCK-Mahoney-10.)

21 MR. BOGLE: Start Bates is  
22 MCK\_MDL\_00496306.

23 BY MR. BOGLE:

24 Q. Okay. Start by sort of

1 orienting you to this document since it's  
2 a larger one here. You see on the front

█ [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED]

8 Q. Okay. Have you seen this  
9 before, this document?

10 A. I'm not sure.

11 Q. Okay. All right. Let's  
12 take a look first at, looking at the  
13 Bates numbers, it's 6309, excuse me.

14 I think it's the third page,  
15 or the fourth page of the document?

16 A. Mm-hmm.

17 Q. And you see this is the  
18 actual order to show cause that was filed  
19 by the DEA, do you see that?

20 A. Yes.

21 Q. Okay. And you've seen this  
22 before, right?

23 A. Yes.

█ [REDACTED] [REDACTED] [REDACTED]

■	[REDACTED]
■	[REDACTED]
■	[REDACTED]
■	[REDACTED]
■	[REDACTED]
■	■ ■
■	■ ■ [REDACTED]
■	[REDACTED] [REDACTED]
■	[REDACTED]
■	■ [REDACTED]
■	■ [REDACTED]
■	[REDACTED]
■	■ ■
■	■ [REDACTED]
■	[REDACTED]
■	■ ■
■	■ [REDACTED]
■	[REDACTED]
■	[REDACTED]
■	[REDACTED]
■	[REDACTED]
■	[REDACTED]
■	[REDACTED]
■	[REDACTED]
■	[REDACTED]
■	[REDACTED]
■	■ [REDACTED]
■	■ ■

A horizontal bar chart titled 'Percentage of respondents who believe that the government should take action to address climate change'. The chart is broken down by age group (18-29, 30-49, 50-69, 70+) and gender (Male, Female). The x-axis represents the percentage of respondents, ranging from 0% to 100%. The y-axis lists the categories. The data is as follows:

Age Group	Gender	Percentage
18-29	Male	85%
	Female	90%
30-49	Male	75%
	Female	80%
50-69	Male	65%
	Female	70%
70+	Male	55%
	Female	60%

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 Do you see that?

13 A. Yes.

14 Q. This term "rogue internet  
15 pharmacies," what do you understand that  
16 to mean?

17 A. I understand it to mean  
18 illegal -- pharmacies that are acting  
19 illegally to sell hydrocodone or  
20 oxycodone or other -- other products.

21 Q. Okay.

22 A. In some cases I think it was  
23 Viagra and Cialis and that kind of thing.



■	[REDACTED]
■	[REDACTED]
■	■ [REDACTED] [REDACTED]
■	■ [REDACTED]
■	[REDACTED]
■	■ [REDACTED]
■	■ [REDACTED]
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■	■ [REDACTED]
■	■ [REDACTED]
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■	[REDACTED] [REDACTED]
■	[REDACTED]
■	■ [REDACTED]
■	■ [REDACTED]
■	[REDACTED]
■	[REDACTED]
■	[REDACTED]



12 MR. SCHMIDT: Object to  
13 form. Compound.

[illegible]

22 MR. SCHMIDT: Objection.

23 Foundation.























■	[REDACTED]			
■		■	[REDACTED]	[REDACTED]
■	[REDACTED]			
■		■	[REDACTED]	
■		■	[REDACTED]	
■	[REDACTED]		[REDACTED]	
■	[REDACTED]		[REDACTED]	
■	[REDACTED]		[REDACTED]	
■	[REDACTED]		[REDACTED]	
■			[REDACTED]	
■			[REDACTED]	
■	[REDACTED]		[REDACTED]	
■	[REDACTED]		[REDACTED]	
■		■	[REDACTED]	
■	[REDACTED]			
■		■	[REDACTED]	
■		■	[REDACTED]	
■		■	[REDACTED]	
■		■	[REDACTED]	
■	[REDACTED]		[REDACTED]	
■	[REDACTED]		[REDACTED]	
■		■	[REDACTED]	[REDACTED]
■	[REDACTED]			
■		■	[REDACTED]	[REDACTED]
■	[REDACTED]		[REDACTED]	
■		■	[REDACTED]	[REDACTED]
■	[REDACTED]		[REDACTED]	
■		■	[REDACTED]	[REDACTED]
■	[REDACTED]		[REDACTED]	
■	[REDACTED]		[REDACTED]	

█

[REDACTED]

2

MR. SCHMIDT: Objection.

3

Foundation.

█

[REDACTED]

[REDACTED]

█

[REDACTED]

█

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

23

MR. SCHMIDT: Objection.

24

Foundation.

Category	Percentage
1	35%
2	15%
3	45%
4	10%
5	55%
6	90%
7	85%
8	100%
9	95%
10	100%
11	20%
12	40%
13	15%
14	50%
15	95%
16	30%

17 MR. SCHMIDT: Objection.  
18 Foundation.

Government	Percentage
Current government	85%
Previous government	15%



[illegible]

■	[REDACTED]
■	[REDACTED]
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■	■ [REDACTED]
■	■ [REDACTED]
■	[REDACTED]
■	[REDACTED]

1	1	1	1
2	1	1	1
3	1	1	1
4	1	1	1
5	1	1	1
6	1	1	1
7	1	1	1
8	1	1	1
9	1	1	1
10	1	1	1
11	1	1	1
12	1	1	1
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92	1	1	1
93	1	1	1
94	1	1	1
95	1	1	1
96	1	1	1
97	1	1	1
98	1	1	1
99	1	1	1
100	1	1	1



The diagram consists of 28 horizontal bars of varying lengths and positions, arranged in a sequence from top to bottom. The bars are colored in a light gray color. The sequence of bars is as follows:

- Bar 1: Starts at the left edge, ends at approximately 80% width.
- Bar 2: Starts at the left edge, ends at approximately 95% width.
- Bar 3: Starts at the left edge, ends at approximately 50% width.
- Bar 4: Starts at approximately 25% width, ends at approximately 90% width.
- Bar 5: Starts at the left edge, ends at approximately 25% width.
- Bar 6: Starts at approximately 25% width, ends at approximately 45% width.
- Bar 7: Starts at approximately 50% width, ends at approximately 75% width.
- Bar 8: Starts at approximately 75% width, ends at approximately 90% width.
- Bar 9: Starts at the left edge, ends at approximately 75% width.
- Bar 10: Starts at the left edge, ends at approximately 95% width.
- Bar 11: Starts at the left edge, ends at approximately 95% width.
- Bar 12: Starts at the left edge, ends at approximately 40% width.
- Bar 13: Starts at approximately 35% width, ends at approximately 70% width.
- Bar 14: Starts at approximately 25% width, ends at approximately 45% width.
- Bar 15: Starts at approximately 25% width, ends at approximately 45% width.
- Bar 16: Starts at approximately 25% width, ends at approximately 85% width.
- Bar 17: Starts at the left edge, ends at approximately 85% width.
- Bar 18: Starts at the left edge, ends at approximately 95% width.
- Bar 19: Starts at the left edge, ends at approximately 20% width.
- Bar 20: Starts at approximately 25% width, ends at approximately 45% width.
- Bar 21: Starts at approximately 25% width, ends at approximately 80% width.
- Bar 22: Starts at approximately 35% width, ends at approximately 85% width.
- Bar 23: Starts at the left edge, ends at approximately 85% width.
- Bar 24: Starts at the left edge, ends at approximately 80% width.
- Bar 25: Starts at approximately 25% width, ends at approximately 55% width.
- Bar 26: Starts at approximately 25% width, ends at approximately 45% width.
- Bar 27: Starts at approximately 50% width, ends at approximately 95% width.

■	[REDACTED]			
■	[REDACTED]			
■	[REDACTED]			
■	[REDACTED]			
■	■	[REDACTED]		
■	■	[REDACTED]		
■	■	[REDACTED]		
■	■	[REDACTED]		
■	■	[REDACTED]		
■	[REDACTED]			
■	[REDACTED]			
■	[REDACTED]			
■	■	[REDACTED]		
■	■	[REDACTED]		
■	[REDACTED]			
■	[REDACTED]		[REDACTED]	
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■	■	[REDACTED]		
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■	[REDACTED]			
■	[REDACTED]		[REDACTED]	
■	[REDACTED]			
■	[REDACTED]			
■	[REDACTED]			
■	■	[REDACTED]		

[illegible]

The image displays a horizontal bar chart with 25 rows. Each row consists of a small gray square on the left, followed by a long gray bar. The bars vary in length and position, with some starting at different horizontal offsets. The bars are arranged in a way that suggests a sequence or progression, with some bars being longer than others and some starting further to the right.



[illegible]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9 MR. SCHMIDT: Objection.  
10 Foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 MR. SCHMIDT: Objection.  
8 Foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

20 MR. SCHMIDT: Same  
21 objection. Foundation.  
22 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15 MR. SCHMIDT: Objection.

16 Foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 MR. SCHMIDT: Objection.  
2 Foundation.

■

■

5 BY MR. BOGLE:

6 Q. Okay. I'm going to hand you  
7 what I'm marking as Exhibit 1.1947.  
8 Exhibit 11. Start Bates is  
9 MCK\_MDL\_00497154.

10 (Document marked for  
11 identification as Exhibit  
12 MCK-Mahoney-11.)

13 MR. SCHMIDT: Are you done  
14 with this one?

15 MR. BOGLE: I'm done for  
16 now, but it's one we'll come back  
17 to at some point. So however you  
18 want to deal with that.

19 MR. SCHMIDT: I'll dig it  
20 out when we come back to it.

21 MR. BOGLE: It's an easy one  
22 to find.

23 BY MR. BOGLE:

24 Q. Okay. So I want to

1   introduce this document to you here.  Oh,  
2   sorry.

[illegible]



[illegible]

24

MR. SCHMIDT: Objection.



The diagram consists of 15 horizontal gray bars of varying lengths and positions, arranged in a staggered fashion. The bars are arranged in a sequence, with some starting at the left edge and others indented. The bars are gray and set against a white background.

18 MR. SCHMIDT: Objection.  
19 Foundation.

A horizontal bar chart consisting of 20 rows. Each row features a small, dark gray square icon on the left side, followed by a larger, light gray rectangular bar. The bars vary in their starting and ending horizontal positions, creating a staggered effect across the rows. The bars are distributed across the width of the chart area, with some starting at the left edge and others indented.

22 MR. SCHMIDT: Objection.

23 Foundation.

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

4 MR. SCHMIDT: Same  
5 objection.

[REDACTED]

7 BY MR. BOGLE:

8 Q. Okay. All right. I'm going  
9 to hand you what I'm marking as  
10 Exhibit 12, which is also marked as  
11 1.1951.

12 (Document marked for  
13 identification as Exhibit  
14 MCK-Mahoney-12.)

15 MR. BOGLE: Bates number  
16 MCKMDL00496536.

17 MR. SCHMIDT: While he's  
18 looking at that I think we're  
19 about an hour. Maybe after this  
20 document, can we take a break?

21 MR. BOGLE: Yeah, we can  
22 take one now if you want.

23 MR. SCHMIDT: No, if you  
24 want to go through the document.

1 I don't want you to get --

2 BY MR. BOGLE:

3 Q. Well, I'll hand you -- all  
4 right. And again, this is government  
5 Exhibit 3. Do you see that statement on  
6 it there?

7 A. Mm-hmm.

8 Q. And I'll represent to you  
9 this came from McKesson as being part of  
10 the show cause exhibits for the Lakeland  
11 show cause proceeding that was given to  
12 us.

13 A. Mm-hmm.

14 Q. You see there's actually a  
15 stamp at the bottom, Drug Enforcement  
16 Administration.

17 A. Right.

18 Q. Right? Do you see that?

19 A. Mm-hmm.

[REDACTED]

[illegible]

■	[REDACTED]		
■	[REDACTED]		
■		[REDACTED]	
■	[REDACTED]		
■	■	■	
■	■	[REDACTED]	
■		[REDACTED]	
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
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■	■	[REDACTED]	
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		[REDACTED]
■	[REDACTED]		
■	■	[REDACTED]	
■	■	[REDACTED]	
■	[REDACTED]		[REDACTED]
■	[REDACTED]		
■		■	[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14 MR. SCHMIDT: Objection.

15 Foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1	1	1	1
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99	1	1	1
100	1	1	1

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 MR. BOGLE: Okay. We can  
14 take a break now.

15 THE VIDEOGRAPHER: Stand by  
16 please. Remove your microphones.  
17 The time is 11:35 a.m. Going off  
18 the record.

19 (Short break.)

20 THE VIDEOGRAPHER: Okay. We  
21 are back on the record. The time  
22 is 11:55 a.m.

23 BY MR. BOGLE:

24 Q. Okay. Mr. Mahoney, if we

<sup>1</sup> can start by going back to Exhibit 7.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Age Group	Percentage
18-24	10%
25-34	20%
35-44	30%
45-54	25%
55-64	15%
65-74	10%
75-84	5%
85+	5%

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Age Group	Percentage
18-24	10%
25-34	20%
35-44	30%
45-54	25%
55-64	15%
65-74	10%
75-84	5%
85+	5%

\_\_\_\_\_

\_\_\_\_\_

Age Group	Percentage
18-24	10%
25-34	20%
35-44	25%
45-54	20%
55-64	15%
65-74	10%
75-84	5%
85+	5%



[REDACTED]

[REDACTED]

[REDACTED]

4

MR. SCHMIDT: Same

5

objection. Characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

MR. SCHMIDT: Objection.

\_\_\_\_\_

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Government	Percentage
Current government	85%
Previous government	15%

3 MR. SCHMIDT: Objection.

#### 4 Characterization.

Group	Percentage
Group 1	~85%
Group 2	~75%
Group 3	~95%
Group 4	~65%
Group 5	~90%
Group 6	~80%
Group 7	~55%

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Response	Percentage
Yes, the president is a threat to the country	85%
No, the president is not a threat to the country	15%

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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\_\_\_\_\_

Government	Percentage
Current government	85%
Previous government	15%

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

(Document marked for  
identification as Exhibit  
MCK-Mahoney-13.)

18 BY MR. BOGLE:

The diagram consists of eight horizontal rectangular blocks stacked vertically. The blocks vary in their starting and ending horizontal positions, creating a staggered effect. From top to bottom:

- Block 1: Starts at the left edge, ends at approximately 30% width.
- Block 2: Starts at approximately 25% width, ends at the right edge.
- Block 3: Starts at the left edge, ends at approximately 80% width.
- Block 4: Starts at the left edge, ends at approximately 65% width.
- Block 5: Starts at the left edge, ends at approximately 70% width.
- Block 6: Starts at approximately 40% width, ends at the right edge.
- Block 7: Starts at the left edge, ends at approximately 20% width.
- Block 8: Starts at approximately 35% width, ends at the right edge.

The diagram consists of 28 horizontal gray bars of varying lengths and positions, arranged in a staggered fashion. The bars are organized into four groups of seven, each group starting with a small gray square on the left. The first group of seven bars is at the top, followed by a second group, then a third group, and finally a fourth group at the bottom. The bars within each group are staggered relative to each other, and the groups themselves are staggered relative to the left edge of the diagram. The bars represent a sequence of events or a timeline, with the length of each bar indicating its duration or extent.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6 MR. SCHMIDT: Objection.

7 Foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

14 MR. SCHMIDT: Objection.  
15 Foundation. Characterization.

Category	Percentage
1	10%
2	20%
3	20%
4	10%
5	20%
6	10%
7	20%
8	20%
9	20%
10	20%
11	10%
12	20%

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

7 Q. Okay. I'm going to hand you  
8 now what I'm marking as Exhibit 14. Also  
9 numbered as 1.1953.

10 (Document marked for  
11 identification as Exhibit  
12 MCK-Mahoney-14.)

13 BY MR. BOGLE:

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15 MR. SCHMIDT: Object to  
16 characterization.

Age Group	I don't know	I would not do it	I would do it	I would not do it
18-24	10%	10%	10%	10%
25-34	10%	10%	10%	10%
35-44	10%	10%	10%	10%
45-54	10%	10%	10%	10%
55-64	10%	10%	10%	10%
65-74	10%	10%	10%	10%
75-84	10%	10%	10%	10%
85-94	10%	10%	10%	10%
95-104	10%	10%	10%	10%

24 MR. SCHMIDT: Same





Category	Percentage
Total	85%
U.S.	85%
Foreign	85%

21 MR. SCHMIDT: Object to the  
22 characterization.

Response	2002 (%)	2007 (%)
In some circumstances	70	73
In no circumstances	26	23
Don't know	4	4

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 Q. I'm going to hand you what  
8 I'm marking as Exhibit 16. Also marked  
9 as 1.1970.

10 (Document marked for  
11 identification as Exhibit  
12 MCK-Mahoney-16.)

13 BY MR. BOGLE:

14 Q. This is an article that I  
15 pulled off the internet from the Ledger  
16 titled "Pharmacy Raided by DEA Agents,"  
17 posted November 17, 2006.

18 Do you see that?

19 A. Yes.

20 Q. Okay. And it says -- and  
21 from Lakeland, "A local pharmacy's  
22 license was suspended Thursday after it  
23 was raided by agents from the U.S. Drug  
24 Enforcement Administration."

1 MR. SCHMIDT: Can I just  
2 have an ongoing, running objection  
3 to the questions on this document,  
4 this unauthenticated document?

5 MR. BOGLE: Okay.

6 BY MR. BOGLE:

7 Q. "Federal agents, with help  
8 from local law enforcement agencies,  
9 seized several boxes of prescription  
10 drugs from Medcenter Pharmacy located  
11 at" -- and it provides the address in  
12 Lakeland. And it says, "Agents also  
13 raided a sister store at 4607 Clark  
14 Avenue in Tampa that operated under the  
15 name MediPharm-Rx, Inc."

16 Do you see that?

17 A. Yes.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 Q. And it says, "Both  
8 pharmacies are owned by a Robert L.  
9 Caddick, whose last known address was in  
10 Oviedo," also in Florida, right?

11 A. Oviedo? Yeah.

12 Q. And then it says, "Jeannette  
13 Moran, spokeswoman for the DEA's Miami  
14 field office, said that both pharmacies'  
15 licenses to sell controlled substances  
16 have been suspended." And then it goes  
17 on to say, "She said the DEA considers  
18 the operation as a whole to be an  
19 imminent danger to public health and  
20 safety."

21 Do you see that reference?

22 A. Yes.

23 Q. And she says -- "She said  
24 agents pulled 635,000 doses of



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. SCHMIDT: Objection.  
11 Foundation.

[REDACTED]

[REDACTED]

14 BY MR. BOGLE:

15 Q. Okay. I'm going to hand you  
16 what I'm marking as 1.1969, also marked  
17 as Exhibit 17.

18 (Document marked for  
19 identification as Exhibit  
20 MCK-Mahoney-17.)

21 MR. SCHMIDT: Same running  
22 objection on the authenticity of  
23 this.

24 MR. BOGLE: Okay.

1 BY MR. BOGLE:

2 Q. You see this is an article  
3 from the Tampa Tribune published  
4 March 17, 2008.

5 Do you see that?

6 A. Yes.

7 Q. Okay. On the second page,  
8 in the middle, I'll kind of point to it  
9 if it helps you. It says, "The DEA also  
10 arrested."

11 A. Okay.

12 Q. It says, "The DEA also  
13 arrested two men tied to a Tampa pharmacy  
14 the agency had targeted in  
15 November 2006." That's the time frame we  
16 just looked at, right, where they were  
17 raided; is that right?

18 A. Yes.

19 Q. Okay. And it lists the  
20 first person's name. The second name is  
21 "Robert Caddick, 51, of 1007 Eagens  
22 Creek, Oviedo, were arrested on federal  
23 charges of conspiracy to possess with  
24 intent to distribute hydrocodone, an

1     opiate nearly equivalent to morphine for  
2     pain relief."

3                     And it's noted further on  
4     down there that Mr. Caddick was the owner  
5     registered agent of MediPharm-Rx. Do you  
6     see that? It's a couple sentences down  
7     from there.

8                     A.     I see it. Yes.

[REDACTED]



1 MR. SCHMIDT: Object to  
2 characterization.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Response	Percentage
U.S. should take more action to address climate change	85%
U.S. should take less action to address climate change	15%

\_\_\_\_\_

\_\_\_\_\_





\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Response	Percentage
Doing a good job	45%
Not doing a good job	55%

\_\_\_\_\_

18 MR. SCHMIDT: Object to the  
19 characterization.

☐ I am a member of the following organization(s) \_\_\_\_\_

☐ \_\_\_\_\_

**■** *Journal of Management Education*, 34(1), 1-10.

☐ \_\_\_\_\_

Government	Percentage
Current government	85%
Previous government	15%

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

5 I'm going to guide you. So it should be  
6 Exhibit 10.

7 A. 10.

8 Q. It's the biggest one.

9 A. Right.

10 MR. SCHMIDT: It's the big?

11 MR. BOGLE: The biggest  
12 document. 1943.

13 MR. SCHMIDT: I just wanted  
14 to get that on the record twice.  
15 No, the second part. Go ahead.  
16 I'm giving you a hard time.

17 MR. BOGLE: No problem.  
18 It's easy to do.

19 BY MR. BOGLE:

20 Q. All right. So let's go to  
21 Page 6444, on the Bates numbers on the  
22 left. I think this will address what you  
23 want to look at.

24 Okay. And this is some

■	[REDACTED]		
■	[REDACTED]	[REDACTED]	
■		■	[REDACTED]
■		■	[REDACTED]
■	[REDACTED]		
■		■	[REDACTED]
■		■	[REDACTED]
■		■	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■			
■		■	[REDACTED]
■		■	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■		[REDACTED]	
■		■	[REDACTED]
■		■	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		

[illegible]

[illegible]



[REDACTED]

5 Q. Okay. I'm going to hand  
6 you -- excuse me.

7 Let me hand you what I'm  
8 marking as Exhibit 1.1997, also marked as  
9 Exhibit 18.

10 (Document marked for  
11 identification as Exhibit  
12 MCK-Mahoney-18.)

13 MR. BOGLE: I think I only  
14 have three of these instead of  
15 four. I apologize for that.

16 BY MR. BOGLE:

[REDACTED]

[illegible]



[illegible]

[illegible]

The chart consists of 18 rows. Each row features a small square icon on the left and a gray bar. The bars vary in their starting and ending horizontal positions relative to the chart's width. The distribution is as follows:

Row	Bar Start (approx. %)	Bar End (approx. %)
1	25	95
2	0	60
3	25	100
4	0	85
5	0	52
6	0	78
7	0	32
8	36	97
9	0	74
10	0	100
11	0	73
12	38	65
13	38	91
14	38	65
15	38	95
16	25	54
17	0	38
18	25	60
19	0	100
20	0	67

17 MR. SCHMIDT: Objection.  
18 Foundation.

Age Group	I don't know	I would like to see a doctor	I would like to see a psychologist	I would like to see a psychiatrist
18-24	10%	40%	30%	20%
25-34	10%	30%	40%	20%
35-44	10%	50%	20%	20%
45-54	10%	20%	30%	40%
55-64	10%	80%	10%	0%
65-74	10%	70%	10%	10%
75-84	10%	70%	10%	10%
85+	10%	70%	10%	10%

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 MR. SCHMIDT: Objection.

18 Foundation.

19 THE WITNESS: Can you say  
20 that again, please?

21 BY MR. BOGLE:

22 Q. Sure.

[REDACTED]

[REDACTED]

[illegible]

[illegible]

The diagram consists of 25 horizontal gray bars of varying lengths and positions, arranged in a staggered fashion. The bars are organized into several groups, with some bars starting at the left edge and others indented. The bars are gray and set against a white background.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. SCHMIDT: Objection.

11 Speculation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18 MR. SCHMIDT: Same

19 objection. Speculation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 MR. SCHMIDT: I'll object to

14 the speculation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

8 MR. SCHMIDT: Objection.

9 Vague.

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

17 MR. SCHMIDT: Same

18 objection. Vague.

19 BY MR. BOGLE:

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 Q. Okay. And you are aware  
11 that settlement occurred in 2008, true?

12 A. Yes.

13 Q. Okay. And as part of that  
14 settlement, McKesson agreed to multiple  
15 things, but one was to pay a fine of  
16 \$13,250,000, right?

17 A. Yes.

18 Q. Okay. And in fairness to  
19 the Lakeland distribution center, it was  
20 for conduct not just involving Lakeland  
21 but involving other distribution centers  
22 too, right?

23 A. Correct.

24 Q. I'm sorry?

1 A. Yes.

2 Q. Okay. Have you seen the  
3 settlement agreement from the 2008  
4 settlement?

5 A. Yes.

6 Q. You have? Okay.

7 I want to take a look at a  
8 couple aspects of that with you here.

9 I'll hand you what I'm  
10 marking as Exhibit 19, also marked as  
11 Exhibit 1.889.

12 (Document marked for  
13 identification as Exhibit  
14 MCK-Mahoney-19.)

15 BY MR. BOGLE:

16 Q. This is titled "Settlement  
17 and Release Agreement and Administrative  
18 Memorandum of Agreement" dated, on the  
19 first page, 2nd day of May, 2008.

20 Do you see that?

21 A. Yes.

22 Q. Okay. So this is a document  
23 that you've seen before, true?

24 A. I believe so.

1 Q. Okay. Do you want to -- if  
2 you want to look at something first, just  
3 let me know.

4 A. Yeah, let me just take a --

5 Q. Yeah, go ahead. Just let me  
6 know when you're ready.

7 A. Okay.

8 Q. Are you familiar with this  
9 document?

10 A. Yes.

11 Q. And so just to sort of  
12 orient ourselves here. Under the  
13 background section, first paragraph says,  
14 "Whereas, on August 4, 2006, DEA by its  
15 deputy assistant administrator Joseph T.  
16 Rannazzisi issued an order to show cause,  
17 Order Number 1, to McKesson with respect  
18 to its Lakeland distribution center," and  
19 then it lists the address.

20 Do you see that?

21 A. Right.

22 Q. Okay. And that's the order  
23 to show cause that we've been talking for  
24 the last hour and a half or so, right?

1 A. Yes.

2 Q. Okay. So then if we can  
3 take a look at Bates page ending 1052, do  
4 you see that toward the top, there's a  
5 little H?

6 A. Yes.

7 Q. It says, "McKesson agrees to  
8 pay civil penalties to the United States  
9 of America under 21 U.S.C. 842(c) for  
10 violations of 21 U.S.C. 842-A(5) in the  
11 amount of \$13,250,000 in settlement of  
12 claims or potential claims made by the  
13 United States of America for failing to  
14 report suspicious orders of controlled  
15 substance and for failing to report  
16 thefts or significant losses of  
17 controlled substances."

18 Do you see that?

19 A. Yes.

20 Q. Okay. You have a general  
21 understanding that that's why -- those  
22 are the reasons why the fine was incurred  
23 by McKesson, right?

24 A. Yes.

1 MR. SCHMIDT: Object to the  
2 characterization.

3 BY MR. BOGLE:

4 Q. And then if you go back to  
5 Page 1060, you see there's a section  
6 towards the middle of the page, it says,  
7 "The covered conduct shall mean the  
8 following alleged conduct."

9 Do you see that?

10 A. Yes.

11 Q. And first of all, I don't  
12 want to go through all six of them. You  
13 would acknowledge there are six different  
14 sections here talking about six different  
15 distribution centers at McKesson, true?

16 MR. SCHMIDT: I'm sorry.

17 What page are you on?

18 MR. BOGLE: Yeah, 1060  
19 carrying over to 1061.

20 MR. SCHMIDT: Thank you.

21 BY MR. BOGLE:

22 Q. My question was simply that  
23 six distribution centers are covered here  
24 in the covered conduct section?



1 A. Yes.

2 Q. Okay. So I want to focus  
3 the one that we've been talking about,  
4 which is Lakeland. So that's letter B.

5 A. Mm-hmm.

6 Q. So it says, "In  
7 October 2005, McKesson-Lakeland sold  
8 approximately 2.1 million dosage units of  
9 hydrocodone to seven pharmacies in the  
10 Tampa area." And then it lists them out.  
11 Do you see that?

12 A. Yes.

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 Q. Okay. "And failed to report  
17 these sales as suspicious orders to the  
18 DEA when discovered as required by and is  
19 a violation of 21 C.F.R. 1301.74(b) and  
20 21 U.S.C. Section 842-A(5)."

21 Do you see that?

22 A. Yes.

23 Q. Okay. And this is a portion  
24 of the settlement agreement that you're

1 familiar with too, right?

2 A. Yes.

3 Q. Okay. And this fine of  
4 \$13,250,000, more than half of that was  
5 related to the conduct at Lakeland,  
6 right?

7 A. Yes.

8 Q. And specifically, Page 1062,  
9 I think, outlines the numbers.

10 So under terms and  
11 conditions, Letter B, it says, "McKesson  
12 shall pay the sum of \$7,456,000. Payment  
13 shall be made by electronic funds." And  
14 it goes on. And that's related to the  
15 conduct at Lakeland, right, the  
16 \$7,456,000 fine, right?

17 A. Yes.

18 Q. Which we can agree is more  
19 than half of the overall fine, right?

20 A. Yes.

21 Q. Also the highest fine  
22 allocated to any specific distribution  
23 center, right?

24 A. Yes.

[REDACTED]

20 Q. Okay. Let me hand you what  
21 I'm marking as Exhibit 20, also marked as  
22 1.1950.

23 (Document marked for  
24 identification as Exhibit



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[illegible]

24

MR. SCHMIDT: Objection.



1 Foundation.

[REDACTED]

[REDACTED]

18 MR. SCHMIDT: Object to the  
19 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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16 MR. SCHMIDT: Object to the  
17 characterization.

18 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

10 MR. SCHMIDT: Objection.

11 Characterization.

[REDACTED]

[REDACTED]

[REDACTED]

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17 MR. SCHMIDT: Object to the  
18 characterization.

[REDACTED]

[REDACTED]

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■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

5 BY MR. BOGLE:

6 Q. Okay.

7 MR. BOGLE: I'm actually  
8 switching to a whole other topic  
9 area. This might be a decent time  
10 to break for lunch if you guys are  
11 okay with it.

12 MR. SCHMIDT: Sure.

13 How much time have we been  
14 on the record for?

15 THE VIDEOGRAPHER: Sure.  
16 We've used up 2 hours 58 minutes.

17 The time is 12:42 p.m.  
18 Going off the record.

19 - - -

20 (Lunch break.)

21 - - -

22 THE VIDEOGRAPHER: We are  
23 back on record. The time is  
24 1:40 p.m.

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A F T E R N O O N S E S S I O N

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- - -

4

EXAMINATION (Cont'd.)

5

- - -

6

BY MR. BOGLE:

7

Q. Okay. Mr. Mahoney, we are

8

back from lunch. I wanted to shift gears

9

a little bit to another topic. We talked

10

about earlier in the deposition that you

11

became the director of regulatory affairs

12

in January 2008, true?

13

A. Yes.

█

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20

Q. Okay. And was that a

21

promotion for you to move from

22

distribution manager to director of

23

regulatory affairs?

24

A. It was a lateral move.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11 MR. SCHMIDT: Object to the  
12 characterization.

13 BY MR. BOGLE:

[REDACTED]

[REDACTED]

16 MR. SCHMIDT: Go ahead. I  
17 cut off your question. You might  
18 want to --

19 MR. BOGLE: Yeah, let me  
20 re-ask the question.

21 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

█

[REDACTED]

2

MR. SCHMIDT: And that's

3

where I object to the

4

characterization.

█

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]



[REDACTED]

9 Q. Okay. I'm going to hand you  
10 what's being marked as Exhibit 1.1675,  
11 also marked as Exhibit 21.

12 (Document marked for  
13 identification as Exhibit  
14 MCK-Mahoney-21.)

15 BY MR. BOGLE:

16 Q. Okay. So to orient you to  
17 the document first, and we'll go from

[REDACTED]

Category	Percentage
Openness	34%
Conscientiousness	41%
Extraversion	38%
Agreeableness	45%
Neuroticism	32%
Dominance	28%
Sensitivity	36%
Imagination	30%
Assertiveness	33%
Warmth	40%
Trust	37%
Skepticism	29%

17 MR. SCHMIDT: Can I say  
18 given the header on this, I don't  
19 know how -- I think this has been  
20 used in prior depositions.

21 MR. BOGLE: I think it has.

22 MR. SCHMIDT: I don't know  
23 how we've been using it. I'm just  
24 going to make an objection and

1 I'll ask it be a running objection  
2 given that this was prepared for  
3 settlement purposes. I don't know  
4 that we've sorted that issue out.  
5 I think we can sort it out later.  
6 If I could make a running  
7 objection on that.

8 MR. BOGLE: That's fine.

9 BY MR. BOGLE:

10 Q. Let me get back to the  
11 question and make sure we are on the same

12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]

19 Q. I'm going to walk you to a  
20 place that I don't think is going to be  
21 confusing. So I have to kind of set the  
22 table here.

23 A. Sure.

24 [REDACTED]

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[illegible]

[REDACTED]

[REDACTED]

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[REDACTED]

5 MR. SCHMIDT: Object to  
6 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 BY MR. BOGLE:

13 Q. Okay. I'm going to hand you  
14 what I'm marking as 1.1960, also  
15 Exhibit 22 to your deposition.

16 (Document marked for  
17 identification as Exhibit  
18 MCK-Mahoney-22.)

19 BY MR. BOGLE:

20 Q. Okay. This is a string of  
21 e-mails, we're going to start at the  
22 bottom. And actually I think it's all  
23 pretty much on the first page.

24 A. Okay.



[REDACTED]

11 Q. Okay. Steve Miller is noted  
12 to be VPDO of the south region. Do you  
13 know what VPDO stands for?

14 A. Yes.

15 Q. What does that stand for?

16 A. Vice president distribution  
17 operations.

18 Q. Okay. Would that be sort of  
19 one step below Don Walker on the  
20 hierarchy at McKesson on the operation  
21 side?

22 A. He -- he reported to Don.

23 Q. Okay. And he was VPDO for  
24 the south region which was the same

1 region you had regulatory responsibility  
2 for during this time, right?

[illegible]

[illegible]

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A vertical list of 20 horizontal bars, each representing a data point or a timeline entry. The bars are gray and vary in their starting and ending positions relative to a vertical axis on the left. Some bars are aligned to the left, some are indented, and some are split into two segments with a gap in between. The bars are arranged in a sequence from top to bottom, with some bars appearing to be grouped or related to others based on their alignment.

22 MR. SCHMIDT: Object to the  
23 characterization.

[illegible]

The diagram consists of 25 horizontal bars of varying lengths and positions, arranged in a sequence from top to bottom. The bars are colored in a light gray color. The sequence of bars is as follows:

- Bar 1: Starts at the left edge, ends at approximately 80% width.
- Bar 2: Starts at the left edge, ends at approximately 95% width.
- Bar 3: Starts at the left edge, ends at approximately 50% width.
- Bar 4: Starts at approximately 35% width, ends at approximately 85% width.
- Bar 5: Starts at the left edge, ends at approximately 95% width.
- Bar 6: Starts at the left edge, ends at approximately 95% width.
- Bar 7: Starts at the left edge, ends at approximately 85% width.
- Bar 8: Starts at the left edge, ends at approximately 85% width.
- Bar 9: Starts at the left edge, ends at approximately 85% width.
- Bar 10: Starts at the left edge, ends at approximately 30% width.
- Bar 11: Starts at approximately 10% width, ends at approximately 35% width.
- Bar 12: Starts at approximately 25% width, ends at approximately 30% width.
- Bar 13: Starts at approximately 35% width, ends at approximately 45% width.
- Bar 14: Starts at approximately 50% width, ends at approximately 90% width.
- Bar 15: Starts at the left edge, ends at approximately 85% width.
- Bar 16: Starts at the left edge, ends at approximately 40% width.
- Bar 17: Starts at approximately 25% width, ends at approximately 30% width.
- Bar 18: Starts at approximately 35% width, ends at approximately 80% width.
- Bar 19: Starts at approximately 25% width, ends at approximately 30% width.
- Bar 20: Starts at approximately 35% width, ends at approximately 45% width.
- Bar 21: Starts at approximately 50% width, ends at approximately 70% width.
- Bar 22: Starts at approximately 75% width, ends at approximately 85% width.
- Bar 23: Starts at the left edge, ends at approximately 95% width.
- Bar 24: Starts at the left edge, ends at approximately 95% width.
- Bar 25: Starts at the left edge, ends at approximately 80% width.
- Bar 26: Starts at the left edge, ends at approximately 95% width.
- Bar 27: Starts at the left edge, ends at approximately 40% width.
- Bar 28: Starts at approximately 25% width, ends at approximately 30% width.
- Bar 29: Starts at approximately 35% width, ends at approximately 45% width.
- Bar 30: Starts at approximately 25% width, ends at approximately 30% width.
- Bar 31: Starts at approximately 35% width, ends at approximately 85% width.
- Bar 32: Starts at the left edge, ends at approximately 20% width.
- Bar 33: Starts at the left edge, ends at approximately 95% width.

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[illegible]

1

characterization.

[illegible]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

5 Q. Okay. I'm going to hand you  
6 what I'm marking Exhibit 1.1942, also  
7 marked as Exhibit 23.

8 (Document marked for  
9 identification as Exhibit  
10 MCK-Mahoney-23.)

11 BY MR. BOGLE:

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[illegible]

A horizontal bar chart with 25 rows. Each row contains a small square icon on the left and a gray bar of varying length. The bars are distributed across the width of the chart, with some starting at the left edge and others indented. The lengths of the bars vary significantly, with some being nearly full-width and others being very short.

[illegible]



17           A.       Tom was the vice  
18       president/general manager in Birmingham.

19 Q. Okay. The term vice  
20 president and general manager, what does  
21 that person generally do at McKesson?  
22 What is that role meant to do?

23           A.       He is -- the director of  
24       operations would report to him as well as

<sup>1</sup> the sales personnel.

2 Q. So that position is more on  
3 the -- on the -- it's sort of a mix  
4 between the operation and sales side?

5                    A.        Yes.

[illegible]

A horizontal bar chart with 20 rows. Each row consists of a small gray square on the left and a gray bar of varying length. The bars are arranged in a pattern that suggests a sequence or flow, with some bars being full-width and others being shorter or split into segments.

21 MR. SCHMIDT: Object to  
22 characterization.

Figure 1 illustrates the experimental design. The process begins with a fixation cross, followed by the presentation of a stimulus (a word) for 200 ms. The participant then provides a response (a button press). The diagram is divided into two main sections: 'Stimulus' and 'Response'.

[illegible]

Row	Start Position (approx. %)	End Position (approx. %)
1	0	15
2	0	95
3	0	80
4	0	90
5	0	75
6	25	95
7	0	85
8	0	80
9	25	40
10	25	90
11	0	10
12	25	40
13	25	100
14	0	40
15	25	40
16	25	90
17	0	90
18	0	85
19	0	95
20	0	80
21	0	100
22	0	90
23	0	60

22 MR. SCHMIDT: Object to  
23 characterization.

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18 MR. SCHMIDT: Object to

19 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

█ [REDACTED]

2 MR. SCHMIDT: Objection.

3 Foundation.

█ [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED] [REDACTED]

█ [REDACTED]

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█ [REDACTED] [REDACTED] [REDACTED]

█ [REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. SCHMIDT: Objection.

11 Foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 [REDACTED]

2 MR. SCHMIDT: Same -- same

3 objection. Asked and answered.

4 [REDACTED] [REDACTED]

5 [REDACTED] [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 MR. SCHMIDT: Objection.

15 Foundation.

16 [REDACTED] [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]





Group	Not responsible	Somewhat responsible	Very responsible	Don't know
All respondents	35%	45%	15%	5%
Ukrainians	25%	55%	15%	5%
U.S. citizens	30%	40%	25%	5%
U.S. citizens who are Democrats/lean Democrat	20%	50%	25%	5%
U.S. citizens who are Republicans/lean Republican	35%	35%	25%	5%
U.S. citizens who are 18-29 years old	25%	45%	25%	5%
U.S. citizens who are 30-49 years old	30%	40%	25%	5%
U.S. citizens who are 50+ years old	35%	45%	15%	5%

9 MR. SCHMIDT: Objection.

10 Foundation.

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 MR. SCHMIDT: Objection.

14 Vague.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 Q. Okay. All right.

13 Okay. I'm going to hand you

14 what's marked as 1.7195, also marked as

15 Exhibit 24.

16 (Document marked for

17 identification as Exhibit

18 MCK-Mahoney-24.)

19 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]



[illegible]

[illegible]



[illegible]

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■	[REDACTED]
■	[REDACTED]

A horizontal bar chart with 20 rows. Each row has a small gray square on the left and a gray bar of varying length. The bars represent percentages of respondents for different categories. The lengths of the bars vary significantly, with some being very short and others nearly spanning the width of the chart area.

Category	Percentage (%)
1	95
2	98
3	95
4	80
5	35
6	75
7	70
8	95
9	25
10	75
11	95
12	50
13	50
14	98
15	35
16	90
17	75
18	95
19	90
20	55
21	15
22	75
23	95
24	95
25	65
26	15
27	55

[illegible]



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3	3	3	3
4	4	4	4
5	5	5	5
6	6	6	6
7	7	7	7
8	8	8	8
9	9	9	9
10	10	10	10
11	11	11	11
12	12	12	12
13	13	13	13
14	14	14	14
15	15	15	15
16	16	16	16
17	17	17	17
18	18	18	18
19	19	19	19
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21	21	21	21
22	22	22	22
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44	44	44	44
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89	89	89	89
90	90	90	90
91	91	91	91
92	92	92	92
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95	95	95	95
96	96	96	96
97	97	97	97
98	98	98	98
99	99	99	99
100	100	100	100

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MR. SCHMIDT: Objection.

3

Foundation.

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22

MR. SCHMIDT: Object to

23

characterization.

█

[illegible]

21 MR. SCHMIDT: Objection.

22 Foundation.

\_\_\_\_\_

\_\_\_\_\_

[illegible]

[REDACTED]

[REDACTED]

3 MR. SCHMIDT: Object to  
4 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5 MR. SCHMIDT: Object to  
6 characterization. Asked and  
7 answered.

[REDACTED]

[REDACTED]

10 BY MR. BOGLE:

11 Q. Okay. I'm going to hand you  
12 what I'm marking as Exhibit 25. Also  
13 marked as 1.1962.

14 (Document marked for  
15 identification as Exhibit  
16 MCK-Mahoney-25.)

17 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14 Do you see that?

15 A. Yes.

16 Q. Have you ever seen this  
17 document before?

18 A. I'm not sure. Do you have a  
19 date on this?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[illegible]

[illegible]

■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■		[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		[REDACTED]
■	[REDACTED]		
■	■	[REDACTED]	
■	■	[REDACTED]	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
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■	[REDACTED]		
■	[REDACTED]		
■		[REDACTED]	
■	■	[REDACTED]	
■	■	[REDACTED]	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	■	[REDACTED]	
■	■	[REDACTED]	

A horizontal bar chart with 20 rows. Each row consists of a small gray square on the left and a gray bar of varying length. The bars are arranged in a pattern that suggests a sequence or flow, with some bars starting at different horizontal positions.

18 MR. SCHMIDT: Object to  
19 characterization.

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 MR. SCHMIDT: Object to  
14 characterization.

15 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 MR. SCHMIDT: Object to  
2 characterization.

[illegible]

19 Q. Okay. Well, maybe we'll  
20 narrow down a few of those issues then.  
21 I'll mark as Exhibit 26, also marked as  
22 Exhibit 1.1743.

23 (Document marked for  
24 identification as Exhibit

<sup>1</sup> MCK-Mahoney-26.)

2 BY MR. BOGLE:

The diagram consists of 28 horizontal gray bars arranged vertically. The bars vary in their starting and ending horizontal positions, creating a stepped or staggered appearance. The sequence of bars from top to bottom is as follows:

- Bar 1: Starts at the left edge, ends at approximately 80% width.
- Bar 2: Starts at the left edge, ends at approximately 60% width.
- Bar 3: Starts at approximately 35% width, ends at approximately 70% width.
- Bar 4: Starts at approximately 25% width, ends at approximately 45% width.
- Bar 5: Starts at approximately 25% width, ends at approximately 80% width.
- Bar 6: Starts at the left edge, ends at approximately 90% width.
- Bar 7: Starts at the left edge, ends at 100% width.
- Bar 8: Starts at approximately 25% width, ends at approximately 75% width.
- Bar 9: Starts at approximately 25% width, ends at approximately 85% width.
- Bar 10: Starts at the left edge, ends at approximately 50% width.
- Bar 11: Starts at approximately 25% width, ends at approximately 85% width.
- Bar 12: Starts at approximately 25% width, ends at approximately 95% width.
- Bar 13: Starts at the left edge, ends at approximately 70% width.
- Bar 14: Starts at the left edge, ends at approximately 85% width.
- Bar 15: Starts at the left edge, ends at approximately 90% width.
- Bar 16: Starts at the left edge, ends at approximately 70% width.
- Bar 17: Starts at the left edge, ends at approximately 95% width.
- Bar 18: Starts at the left edge, ends at approximately 90% width.
- Bar 19: Starts at approximately 25% width, ends at approximately 45% width.
- Bar 20: Starts at approximately 35% width, ends at approximately 85% width.
- Bar 21: Starts at the left edge, ends at 100% width.
- Bar 22: Starts at the left edge, ends at approximately 25% width.
- Bar 23: Starts at approximately 25% width, ends at approximately 85% width.
- Bar 24: Starts at the left edge, ends at approximately 95% width.
- Bar 25: Starts at the left edge, ends at approximately 75% width.
- Bar 26: Starts at the left edge, ends at 100% width.





[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14 MR. SCHMIDT: Objection.

15 Foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The image shows a horizontal bar chart with 25 rows. Each row begins with a small gray square. The bars are gray and vary in length and position. The bars are arranged in a way that suggests a sequence or progression, with some rows having multiple segments. The bars are arranged in a way that suggests a sequence or progression, with some rows having multiple segments.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16 MR. BOGLE: I'm done with my  
17 questions. Mr. Bowden is going to  
18 have some additional follow-up.  
19 Maybe we can take a break and  
20 switch around. I'm done with  
21 mine.

22 MR. SCHMIDT: Are we at four  
23 hours now?

24 THE VIDEOGRAPHER: We are at

1 4 hours and 3 minutes.

2 Shall we go off the record.

3 MR. BOGLE: Yes.

4 THE VIDEOGRAPHER: The time  
5 2:45 p.m. Going off the record.

6 (Short break.)

7 THE VIDEOGRAPHER: We are  
8 back on the record. The time is  
9 3:04 p.m.

10 - - -

11 EXAMINATION

12 - - -

13 BY MR. BOWDEN:

14 Q. Good afternoon, Mr. Mahoney.

15 A. What's going on?

16 Q. My name is Wes Bowden. I'm  
17 going to ask you a couple questions and  
18 finish out your deposition.

19 A. Okay.

20 Q. Before we left off the break  
21 you talked with my partner about some of  
22 the larger issues with the CSMP.

23 And one thing that I was  
24 going to ask you about -- trying to get

1 my computer booted up here. You had

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11

MR. SCHMIDT: Object to the

12

characterization.

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16

BY MR. BOWDEN:

17

Q. Okay.

█

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[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

10 MR. SCHMIDT: Can I just  
11 remind the folks on the phone to  
12 go on mute, including people who  
13 are typing and shuffling papers.

14 BY MR. BOWDEN:

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

20 Q. Okay. I'm going to hand you  
21 what I will mark as Exhibit 27. It's  
22 RP-1.1680.

23 MR. SCHMIDT: Again, can I  
24 ask people on the phone to go on





[illegible]

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■		[REDACTED]	
■	[REDACTED]		
■		■	[REDACTED]
■		■	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■		■	[REDACTED]
■	[REDACTED]		
■		■	[REDACTED]
■		■	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■			[REDACTED]
■	[REDACTED]		
■		■	[REDACTED]
■		■	[REDACTED]
■	[REDACTED]		
■		■	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		

Row	Bar Length (approx. % of total width)
1	45
2	70
3	100
4	95
5	15
6	55
7	55
8	95
9	100
10	55
11	85
12	95
13	70
14	15
15	85
16	100
17	100
18	85
19	25

19 MR. SCHMIDT: Object to  
20 characterization.

Response	Percentage
U.S. should take action	71%
U.S. should not take action	18%
U.S. should take action but not get involved in the fighting	7%
U.S. should not take action but should get involved in the fighting	4%

[illegible]

Age Group	All respondents	People who have been vaccinated	People who have not been vaccinated	People who have been vaccinated and are also wearing a mask	People who have not been vaccinated and are not wearing a mask
18-24	10%	10%	10%	10%	10%
25-34	10%	10%	10%	10%	10%
35-44	10%	10%	10%	10%	10%
45-54	10%	10%	10%	10%	10%
55-64	10%	10%	10%	10%	10%
65-74	10%	10%	10%	10%	10%
75+	10%	10%	10%	10%	10%

14 MR. SCHMIDT: Object to the  
15 characterization.

Reason for Leaving	Percentage of Respondents
Not enough money	10%
Not enough hours	8%
Not enough growth	7%
Not enough challenge	6%
Not enough autonomy	5%
Not enough respect	4%
Not enough recognition	3%
Not enough learning	2%
Not enough fun	1%
Not enough meaning	1%



[REDACTED]

[REDACTED]

[REDACTED]

4 MR. SCHMIDT: Object to the  
5 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15 MR. SCHMIDT: Object to  
16 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[illegible]





■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■		[REDACTED]	
■	[REDACTED]		
■	■	■	
■	■	[REDACTED]	
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■		[REDACTED]	
■	[REDACTED]		
■	[REDACTED]		
■		[REDACTED]	
■	[REDACTED]		[REDACTED]
■	[REDACTED]		
■		[REDACTED]	
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■		[REDACTED]	
■	[REDACTED]		

Category	Percentage
1	0%
2	0%
3	0%
4	0%
5	0%
6	0%
7	0%
8	0%
9	0%
10	0%
11	0%
12	0%
13	0%
14	0%
15	0%
16	0%
17	0%
18	0%
19	0%
20	0%
21	0%
22	0%
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28	0%
29	0%
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31	0%
32	0%
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36	0%
37	0%
38	0%
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41	0%
42	0%
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82	0%
83	0%
84	0%
85	0%
86	0%
87	0%
88	0%
89	0%
90	0%
91	0%
92	0%
93	0%
94	0%
95	0%
96	0%
97	0%
98	0%
99	0%
100	0%

21 MR. SCHMIDT: Objection.  
22 Foundation.

\_\_\_\_\_

\_\_\_\_\_

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6 Q. And Conroe at the time, when  
7 we first started the deposition, you had  
8 listed six different distribution centers  
9 in which you were overseeing. And Conroe  
10 was one of them, right?

11 A. Yes. Yes.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Highly Confidential - Subject to Further Confidentiality Review

[illegible]



Category	Percentage
1	100%
2	90%
3	90%
4	100%
5	90%
6	60%
7	40%
8	20%
9	20%
10	60%
11	100%
12	90%
13	80%
14	20%
15	20%
16	100%
17	80%
18	100%
19	60%
20	40%
21	40%
22	60%
23	80%
24	80%
25	100%
26	100%
27	100%

■	[REDACTED]				
■		■	■ [REDACTED]		
■		■	■ [REDACTED]		
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]				
■		■	■ [REDACTED]		
■		■	■ [REDACTED]		
■	[REDACTED]				
■	[REDACTED]				
■		[REDACTED]			
■	[REDACTED]				
■	[REDACTED]				
■		■	■ [REDACTED]		
■		■	■ [REDACTED]		
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]	[REDACTED]			
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]				
■		[REDACTED]			

1	1	1	1
2	2	2	2
3	3	3	3
4	4	4	4
5	5	5	5
6	6	6	6
7	7	7	7
8	8	8	8
9	9	9	9
10	10	10	10
11	11	11	11
12	12	12	12
13	13	13	13
14	14	14	14
15	15	15	15
16	16	16	16
17	17	17	17
18	18	18	18
19	19	19	19
20	20	20	20
21	21	21	21
22	22	22	22
23	23	23	23
24	24	24	24
25	25	25	25
26	26	26	26
27	27	27	27
28	28	28	28
29	29	29	29
30	30	30	30
31	31	31	31
32	32	32	32
33	33	33	33
34	34	34	34
35	35	35	35
36	36	36	36
37	37	37	37
38	38	38	38
39	39	39	39
40	40	40	40
41	41	41	41
42	42	42	42
43	43	43	43
44	44	44	44
45	45	45	45
46	46	46	46
47	47	47	47
48	48	48	48
49	49	49	49
50	50	50	50
51	51	51	51
52	52	52	52
53	53	53	53
54	54	54	54
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56	56	56	56
57	57	57	57
58	58	58	58
59	59	59	59
60	60	60	60
61	61	61	61
62	62	62	62
63	63	63	63
64	64	64	64
65	65	65	65
66	66	66	66
67	67	67	67
68	68	68	68
69	69	69	69
70	70	70	70
71	71	71	71
72	72	72	72
73	73	73	73
74	74	74	74
75	75	75	75
76	76	76	76
77	77	77	77
78	78	78	78
79	79	79	79
80	80	80	80
81	81	81	81
82	82	82	82
83	83	83	83
84	84	84	84
85	85	85	85
86	86	86	86
87	87	87	87
88	88	88	88
89	89	89	89
90	90	90	90
91	91	91	91
92	92	92	92
93	93	93	93
94	94	94	94
95	95	95	95
96	96	96	96
97	97	97	97
98	98	98	98
99	99	99	99
100	100	100	100

[REDACTED]

21 Q. In 2011, how many  
22 distribution centers did McKesson have?

23 A. I'm not sure.

24 Q. You think about 30?





<sup>1</sup> vice president, right?

2                    A.        Yes.

3 Q. And he was the person that  
4 you answered to?

5                      A.        Yes.

Government	Percentage
Current government	85%
Previous government	15%

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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\_\_\_\_\_

\_\_\_\_\_





\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

 University of Twente

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14 right. I'm handing you what I'm marking  
15 as Exhibit 29 to your deposition.

16 (Document marked for  
17 identification as Exhibit  
18 Mahoney-29.)

19 BY MR. BOWDEN:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[illegible]

1	[REDACTED]		
2		[REDACTED]	
3		[REDACTED]	[REDACTED]
4		[REDACTED]	[REDACTED]
5	[REDACTED]		
6		[REDACTED]	[REDACTED]
7		[REDACTED]	[REDACTED]
8	[REDACTED]		
9	[REDACTED]		
10	[REDACTED]	[REDACTED]	[REDACTED]
11	[REDACTED]		
12		[REDACTED]	
13	[REDACTED]		
14	[REDACTED]	[REDACTED]	
15	[REDACTED]		
16	[REDACTED]		
17		[REDACTED]	
18		[REDACTED]	[REDACTED]
19		[REDACTED]	[REDACTED]
20	[REDACTED]		
21	[REDACTED]		
22		[REDACTED]	
23		[REDACTED]	[REDACTED]
24		[REDACTED]	[REDACTED]
25	[REDACTED]		
26	[REDACTED]		
27		[REDACTED]	
28	[REDACTED]		

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 MR. SCHMIDT: Objection.

14 Foundation.

15 BY MR. BOWDEN:

16 Q. Is that correct?

17 A. I think there was --

18 MR. SCHMIDT: Same

19 objection.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7

MR. SCHMIDT: Object to the

8

characterization.

9

BY MR. BOWDEN:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18 MR. SCHMIDT: Object to the  
19 characterization.

Response	Percentage
Yes, the U.S. should take action to reduce greenhouse gas emissions	95%
No, the U.S. should not take action to reduce greenhouse gas emissions	5%

A horizontal bar chart with 20 rows. Each row consists of a small gray square on the left and a gray bar of varying length extending to the right. The bars are of different lengths, with some being very short and others nearly spanning the width of the chart area.

characterization.





[illegible]

18 MR. SCHMIDT: Objection.  
19 Foundation.

```

graph LR
    subgraph LeftStack [ ]
        direction TB
        L1[ ]
        L2[ ]
        L3[ ]
        L4[ ]
        L5[ ]
        L6[ ]
    end
    subgraph RightSequence [ ]
        direction LR
        R1[ ]
        R2[ ]
        R3[ ]
        R4[ ]
        R5[ ]
        R6[ ]
        R7[ ]
    end
    L1 --- R1
    L1 --- R2
    L2 --- R3
    L3 --- R4
    L4 --- R5
    L5 --- R6
    L5 --- R7
    L6 --- None
  
```

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14 MR. SCHMIDT: Objection.

15 Compound. Characterization.

16 BY MR. BOWDEN:

17 Q. Isn't that what you  
18 testified to earlier?

19 A. Could you repeat that?

20 MR. SCHMIDT: Same  
21 objection.

22 BY MR. BOWDEN:

[REDACTED]

[REDACTED]

[illegible]

A horizontal bar chart with 25 rows. Each row features a small gray square on the left, followed by a gray bar of varying length. The bars are arranged in a staggered, overlapping fashion, creating a sense of depth and movement. The bars are gray, and the background is white.

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 MR. SCHMIDT: Objection.

18 Foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A horizontal bar chart with 100 rows. Each row contains a small square icon on the left and a horizontal bar of varying length to its right. The bars represent percentages, with some reaching 100% and others being shorter. The bars are arranged in a grid-like pattern, with some rows having multiple bars of different lengths. The bars are colored in a light gray shade.

[REDACTED]

2 MR. SCHMIDT: Object to the  
3 characterization, foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15 MR. SCHMIDT: Object to the  
16 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[illegible]

1                    characterization.

█                    █                    █  
█                    █  
█                    █  
█                    █  
█                    █                    █  
█                    █                    █  
█                    █

█                    █

█                    █                    █

█                    █

█                    █                    █

13                    MR. SCHMIDT:    Just a second.

14                    Were you finished with your

15                    answer?

16                    THE WITNESS:    No, not yet.

17                    BY MR. BOWDEN:

18                    Q.                I'm sorry, go ahead, sir.

█                    █                    █

█                    █

█                    █

█                    █                    █

█                    █                    █

█                    █

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 BY MR. BOWDEN:

14 Q. Okay. You can go ahead and  
15 set that one aside, sir.

16 I'm going to mark for you  
17 what will be Exhibit Number 30 to your  
18 deposition. Going to be P-1.1936.

19 (Document marked for  
20 identification as Exhibit  
21 Mahoney-30.)

22 BY MR. BOWDEN:

[REDACTED]

[REDACTED]

[illegible]

The chart displays the percentage of respondents for various categories. The categories are listed on the left, and the percentages are shown as gray bars. The chart is divided into two main sections: 'Top 10' and 'Other'.

Category	Percentage
Top 10	
Category 1	85%
Category 2	90%
Category 3	75%
Category 4	80%
Category 5	90%
Category 6	10%
Category 7	10%
Category 8	90%
Category 9	100%
Category 10	85%
Other	
Category 11	100%
Category 12	85%
Category 13	90%
Category 14	80%
Category 15	10%
Category 16	10%
Category 17	10%
Category 18	85%
Category 19	90%
Category 20	85%
Category 21	100%
Category 22	40%

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 MR. SCHMIDT: Object to the  
14 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[illegible]



23 MR. SCHMIDT: Object to the  
24 characterization.

1 THE WITNESS: I'm curious  
2 about what you're referring to.

3 BY MR. BOWDEN:

█ █ █ █  
█  
█  
█  
█  
█  
█  
█  
█  
█

11 Q. Okay. I'll hand you what  
12 I'm marking Exhibit 31. It's P1.1979.

13 (Document marked for  
14 identification as Exhibit  
15 Mahoney-31.)

16 BY MR. BOWDEN:

17 Q. Why don't you go ahead and  
18 flip to the last page of this document.

█  
█  
█ █ █  
█ █  
█  
█

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18 MR. SCHMIDT: Objection.

19 Foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4 MR. SCHMIDT: Objection.

5 Foundation.

6 THE WITNESS: Can you repeat  
7 that again?

8 BY MR. BOWDEN:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 Q. How many distribution  
8 centers are there as we sit here today?

9 A. My estimate would be around  
10 28 plus or minus one or two.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Category	Percentage
1	85
2	75
3	90
4	85
5	85
6	40
7	95
8	35
9	65
10	80
11	85
12	15
13	95
14	35
15	95
16	85
17	55
18	90
19	90
20	80
21	90
22	85
23	90
24	80
25	30
26	65
27	15
28	35

The diagram consists of a vertical list of eight items. Each item is represented by a small square icon on the left and a horizontal bar on the right. The bars vary in length and position, indicating different levels of detail or focus for each item. The items are arranged in a vertical column, with the bars extending to the right from a common vertical line.

8 MR. SCHMIDT: Object to the  
9 characterization.

The diagram consists of 15 horizontal gray bars stacked vertically. The bars vary in their starting and ending horizontal positions, creating a stepped or staggered effect. The top bar is the longest and starts at the left edge. Subsequent bars are shorter and often start further to the right, indicating a progression or a sequence of events over time. The bars are evenly spaced, and the overall layout is clean and minimalist.



[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 MR. SCHMIDT: Objection.

18 Characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9 MR. SCHMIDT: Objection.  
10 Speculation.

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

21 MR. SCHMIDT: Objection.

22 Vague.

■ **1990** ■ **1991** ■ **1992** ■ **1993** ■ **1994** ■ **1995** ■ **1996** ■ **1997** ■ **1998** ■ **1999** ■ **2000** ■ **2001** ■ **2002** ■ **2003** ■ **2004** ■ **2005** ■ **2006** ■ **2007** ■ **2008** ■ **2009** ■ **2010** ■ **2011** ■ **2012** ■ **2013** ■ **2014** ■ **2015** ■ **2016** ■ **2017** ■ **2018** ■ **2019** ■ **2020** ■ **2021** ■ **2022** ■ **2023** ■ **2024** ■ **2025** ■ **2026** ■ **2027** ■ **2028** ■ **2029** ■ **2030** ■ **2031** ■ **2032** ■ **2033** ■ **2034** ■ **2035** ■ **2036** ■ **2037** ■ **2038** ■ **2039** ■ **2040** ■ **2041** ■ **2042** ■ **2043** ■ **2044** ■ **2045** ■ **2046** ■ **2047** ■ **2048** ■ **2049** ■ **2050** ■ **2051** ■ **2052** ■ **2053** ■ **2054** ■ **2055** ■ **2056** ■ **2057** ■ **2058** ■ **2059** ■ **2060** ■ **2061** ■ **2062** ■ **2063** ■ **2064** ■ **2065** ■ **2066** ■ **2067** ■ **2068** ■ **2069** ■ **2070** ■ **2071** ■ **2072** ■ **2073** ■ **2074** ■ **2075** ■ **2076** ■ **2077** ■ **2078** ■ **2079** ■ **2080** ■ **2081** ■ **2082** ■ **2083** ■ **2084** ■ **2085** ■ **2086** ■ **2087** ■ **2088** ■ **2089** ■ **2090** ■ **2091** ■ **2092** ■ **2093** ■ **2094** ■ **2095** ■ **2096** ■ **2097** ■ **2098** ■ **2099** ■ **2100** ■ **2101** ■ **2102** ■ **2103** ■ **2104** ■ **2105** ■ **2106** ■ **2107** ■ **2108** ■ **2109** ■ **2110** ■ **2111** ■ **2112** ■ **2113** ■ **2114** ■ **2115** ■ **2116** ■ **2117** ■ **2118** ■ **2119** ■ **2120** ■ **2121** ■ **2122** ■ **2123** ■ **2124** ■ **2125** ■ **2126** ■ **2127** ■ **2128** ■ **2129** ■ **2130** ■ **2131** ■ **2132** ■ **2133** ■ **2134** ■ **2135** ■ **2136** ■ **2137** ■ **2138** ■ **2139** ■ **2140** ■ **2141** ■ **2142** ■ **2143** ■ **2144** ■ **2145** ■ **2146** ■ **2147** ■ **2148** ■ **2149** ■ **2150** ■ **2151** ■ **2152** ■ **2153** ■ **2154** ■ **2155** ■ **2156** ■ **2157** ■ **2158** ■ **2159** ■ **2160** ■ **2161** ■ **2162** ■ **2163** ■ **2164** ■ **2165** ■ **2166** ■ **2167** ■ **2168** ■ **2169** ■ **2170** ■ **2171** ■ **2172** ■ **2173** ■ **2174** ■ **2175** ■ **2176** ■ **2177** ■ **2178** ■ **2179** ■ **2180** ■ **2181** ■ **2182** ■ **2183** ■ **2184** ■ **2185** ■ **2186** ■ **2187** ■ **2188** ■ **2189** ■ **2190** ■ **2191** ■ **2192** ■ **2193** ■ **2194** ■ **2195** ■ **2196** ■ **2197** ■ **2198** ■ **2199** ■ **2200** ■ **2201** ■ **2202** ■ **2203** ■ **2204** ■ **2205** ■ **2206** ■ **2207** ■ **2208** ■ **2209** ■ **2210** ■ **2211** ■ **2212** ■ **2213** ■ **2214** ■ **2215** ■ **2216** ■ **2217** ■ **2218** ■ **2219** ■ **2220** ■ **2221** ■ **2222** ■ **2223** ■ **2224** ■ **2225** ■ **2226** ■ **2227** ■ **2228** ■ **2229** ■ **2230** ■ **2231** ■ **2232** ■ **2233** ■ **2234** ■ **2235** ■ **2236** ■ **2237** ■ **2238** ■ **2239** ■ **2240** ■ **2241** ■ **2242** ■ **2243** ■ **2244** ■ **2245** ■ **2246** ■ **2247** ■ **2248** ■ **2249** ■ **2250** ■ **2251** ■ **2252** ■ **2253** ■ **2254** ■ **2255** ■ **2256** ■ **2257** ■ **2258** ■ **2259** ■ **2260** ■ **2261** ■ **2262** ■ **2263** ■ **2264** ■ **2265** ■ **2266** ■ **2267** ■ **2268** ■ **2269** ■ **2270** ■ **2271** ■ **2272** ■ **2273** ■ **2274** ■ **2275** ■ **2276** ■ **2277** ■ **2278** ■ **2279** ■ **2280** ■ **2281** ■ **2282** ■ **2283** ■ **2284** ■ **2285** ■ **2286** ■ **2287** ■ **2288** ■ **2289** ■ **2290** ■ **2291** ■ **2292** ■ **2293** ■ **2294** ■ **2295** ■ **2296** ■ **2297** ■ **2298** ■ **2299** ■ **2300** ■ **2301** ■ **2302** ■ **2303** ■ **2304** ■ **2305** ■ **2306** ■ **2307** ■ **2308** ■ **2309** ■ **2310** ■ **2311** ■ **2312** ■ **2313** ■ **2314** ■ **2315** ■ **2316** ■ **2317** ■ **2318** ■ **2319** ■ **2320** ■ **2321** ■ **2322** ■ **2323** ■ **2324** ■ **2325** ■ **2326** ■ **2327** ■ **2328** ■ **2329** ■ **2330** ■ **2331** ■ **2332** ■ **2333** ■ **2334** ■ **2335** ■ **2336** ■ **2337** ■ **2338** ■ **2339** ■ **2340** ■ **2341** ■ **2342** ■ **2343** ■ **2344** ■ **2345** ■ **2346** ■ **2347** ■ **2348** ■ **2349** ■ **2350** ■ **2351** ■ **2352** ■ **2353** ■ **2354** ■ **2355** ■ **2356** ■ **2357** ■ **2358** ■ **2359** ■ **2360** ■ **2361** ■ <

[illegible]

24

MR. SCHMIDT: Objection.

1                   Object to characterization. I'll  
2                   move to strike the preamble.

3                   THE WITNESS: What's the  
4                   question?

5 BY MR. BOWDEN:

6                   Q. I'll rephrase it since  
7                   there's an objection.

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16

MR. SCHMIDT: Objection.

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Foundation.

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[illegible]

16 MR. SCHMIDT: Objection.

17 Characterization.

The diagram consists of eight horizontal gray bars of varying lengths and positions, arranged in a sequence from top to bottom. The bars are set against a white background. The first bar is the longest and is positioned at the top. The second bar is shorter and starts further to the right. The third bar is the shortest and is positioned in the middle. The fourth bar is medium-length and starts further to the right. The fifth bar is the longest and is positioned at the bottom. The sixth bar is medium-length and starts further to the right. The seventh bar is the shortest and is positioned in the middle. The eighth bar is medium-length and starts further to the right. The bars are arranged in a way that suggests a progression from left to right, with some bars starting at different points and ending at different points, creating a staggered effect.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 MR. SCHMIDT: Object to  
14 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

21 MR. BOWDEN: I'm about to  
22 switch gears. Do you want to take  
23 a break? We went 56 minutes.

24 MR. SCHMIDT: Yeah, I just



1 figure -- don't want to be here  
2 late into the night.

3 MR. BOWDEN: That's fine. I  
4 just want to get some water.

5 THE VIDEOGRAPHER: Okay.  
6 Stand by, please. The time is  
7 4:01 p.m. Going off the record.  
8 (Brief recess.)

9 THE VIDEOGRAPHER: We are  
10 back on the record. The time is  
11 4:16 p.m.

12 BY MR. BOWDEN:

13 Q. All right, Mr. Mahoney.

[REDACTED]

[REDACTED]

4 Q. Okay. Well, just in  
5 general, though, having controls in place  
6 to make sure that opioids get into the  
7 right hands is a good thing, right?

8 A. Yes.

9 Q. It's a good thing because  
10 opioids can have a dramatic impact on  
11 people's lives, addiction, injury,  
12 potentially death, right?

[REDACTED]

15 Q. Right. But that's not what  
16 the DEA was concerned with, was it? It  
17 wasn't people such as yourself who might  
18 take it for a brief period of time and  
19 then let go of it. It was for the  
20 epidemic that had been brewing since the  
21 2000s, right?

22 MR. SCHMIDT: Objection.

23 THE WITNESS: I've had  
24 interactions actually recently

1           with the DEA around Hurricane  
2           Michael in which they wanted to  
3           make sure that people had access  
4           to their opioids.

5       BY MR. BOWDEN:

6           Q.     Okay. And -- okay. But  
7           you're talking about something that's  
8           going to be an act of God or a natural  
9           disaster, making sure that the support is  
10          there so that people get medication who  
11          were prescribed medication and should be  
12          legitimately taking it, right?

13          A.     I'm sorry. Can you repeat  
14          the last --

15          Q.     What you're talking about  
16          anecdotally is that there might be very  
17          narrow circumstances in which the DEA  
18          might want drugs to go out there to make  
19          sure that people with legitimate medical  
20          needs, that their needs are met, correct?

21          A.     I think -- I think that the  
22          DEA understands that it's gray in terms  
23          of determining, especially from a  
24          distributor's point of view, how hard it

1 is to determine whether something is for  
2 legitimate medical purpose or it's for  
3 some other illicit purpose. And that's  
4 why we do what we do.

5 Q. Okay. Well, I'm going to  
6 hand you what I've marked as Exhibit 32  
7 to your deposition. This would be  
8 P1.1845.

9 (Document marked for  
10 identification as Exhibit  
11 Mahoney-32.)

12 BY MR. BOWDEN:

13 Q. And you know that McKesson  
14 also distributes methadone, right?

15 A. Yes.

16 Q. And in 2008, McKesson was  
17 distributing methadone, right?

18 A. Yes.

█ █ █ █ █  
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[illegible]

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[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
Q. Right. So let me hand you  
what I'm marking as Exhibit 33, which  
will be P1.1848.

(Document marked for  
identification as Exhibit  
Mahoney-33.)

MR. SCHMIDT: Can we put  
this to the side, or do you want  
him to keep it?

MR. BOWDEN: He can probably  
put it to the side. That's fine.

1 BY MR. BOWDEN:

2 Q. Now, in January of 2008,  
3 were you still the distribution center  
4 manager for Lakeland, Florida?

[REDACTED]

[illegible]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. BOWDEN: In fact,  
11 Michael, can we do a split screen  
12 with the top paragraph of the last  
13 document?

14 If you can put underneath  
15 that, yeah, put that at the top  
16 for our witness to see.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19 MR. BOWDEN: And can you put  
20 the block quote from the other  
21 paragraph from the other exhibit

[REDACTED]

24 That's good enough.

1 BY MR. BOWDEN:

2           Q.     While he's doing that we'll  
3     go ahead and read it.

A series of 20 horizontal bars of varying lengths and positions, representing a data visualization. The bars are gray and set against a white background. The lengths and positions vary significantly, with some bars spanning most of the width and others being very short or offset.

21 MR. SCHMIDT: Objection.  
22 Compound.

23 BY MR. BOWDEN:

24 Q. That's what this document



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. SCHMIDT: Objection to  
11 the characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

22 MR. SCHMIDT: Object to --  
23 object to the characterization.

24 BY MR. BOWDEN:

[illegible]

A horizontal bar chart with a light gray background. The y-axis lists six age groups: 18-29, 30-49, 50-64, 65+, 75+, and 75+. The x-axis represents percentages from 0 to 100, with major grid lines every 10 units. Each age group has a gray horizontal bar. The lengths of the bars are approximately: 18-29 (85%), 30-49 (90%), 50-64 (95%), 65+ (98%), 75+ (80%), and 75+ (40%).

Age Group	Percentage
18-29	85%
30-49	90%
50-64	95%
65+	98%
75+	80%
75+	40%

7 MR. SCHMIDT: Object to the  
8 characterization.

The diagram consists of 15 horizontal gray bars of varying lengths and positions, arranged in a staggered fashion. The bars are organized into four groups based on their vertical alignment:

- Group 1 (Top):** 5 bars. The first bar is the longest, spanning from the left edge to the right edge. The second bar is shorter, starting at the same left edge but ending earlier. The third bar starts further to the right and ends at the same right edge. The fourth bar starts further to the right and ends earlier. The fifth bar starts further to the right and ends at the same right edge.
- Group 2:** 1 bar. A single bar starting at the left edge and ending at the same point as the second bar in Group 1.
- Group 3:** 4 bars. The first bar starts at the left edge and ends at the same point as the third bar in Group 1. The second bar starts further to the right and ends at the same point as the fourth bar in Group 1. The third bar starts further to the right and ends at the same point as the fifth bar in Group 1. The fourth bar starts further to the right and ends at the same point as the first bar in Group 1.
- Group 4 (Bottom):** 5 bars. The first bar starts at the left edge and ends at the same point as the first bar in Group 3. The second bar starts further to the right and ends at the same point as the second bar in Group 3. The third bar starts further to the right and ends at the same point as the third bar in Group 3. The fourth bar starts further to the right and ends at the same point as the fourth bar in Group 3. The fifth bar starts further to the right and ends at the same point as the fifth bar in Group 3.

1	1	1	1
2	2	2	2
3	3	3	3
4	4	4	4
5	5	5	5
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7	7	7	7
8	8	8	8
9	9	9	9
10	10	10	10
11	11	11	11
12	12	12	12
13	13	13	13
14	14	14	14
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93	93	93	93
94	94	94	94
95	95	95	95
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97	97	97	97
98	98	98	98
99	99	99	99
100	100	100	100



[REDACTED]

[REDACTED]

3 MR. SCHMIDT: Objection.

4 Form.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23 MR. SCHMIDT: Object to

24 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 MR. SCHMIDT: Object to  
18 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6 BY MR. BOWDEN:

7 Q. Okay. All right. I'm going  
8 to hand you what I will mark as 34,  
9 Exhibit 34 to your deposition. That will  
10 be P-1.1959.

11 (Document marked for  
12 identification as Exhibit  
13 Mahoney-34.)

14 MR. SCHMIDT: Sorry.

15 MR. BOWDEN: No problem.

16 BY MR. BOWDEN:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 MR. SCHMIDT: Object to  
13 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[illegible]

A horizontal bar chart with 25 rows. Each row has a small square marker on the left and a corresponding horizontal bar. The bars vary in length and position, representing percentages. The bars are gray, and the background is white. The chart is enclosed in a black border.

Category	Percentage
1	85%
2	95%
3	55% 65%
4	60%
5	75%
6	15%
7	25% 55%
8	25% 95%
9	85%
10	55%
11	75%
12	15%
13	25% 50%
14	25% 85%
15	95%
16	45% 90%
17	95%
18	15% 90%
19	95%
20	55%
21	75%
22	45%
23	25% 55%
24	25% 90%

[illegible]



[illegible]

[illegible]

[REDACTED]

6 MR. SCHMIDT: Objection.  
7 Compound.

8 THE WITNESS: What's the  
9 question?

10 BY MR. BOWDEN:

[REDACTED]

Category	Percentage of Respondents
1. Meat and poultry	33%
2. Seafood	10%
3. Eggs	10%
4. Dairy	33%
5. Beans, lentils, and peas	10%
6. Nuts and seeds	10%
7. Grains	33%
8. Vegetables	33%
9. Fruits	33%
10. Herbs and spices	10%
11. Oils and fats	10%
12. Breads and pastas	33%
13. Snacks	10%
14. Desserts	10%
15. Beverages	10%
16. Other	10%

17 MR. SCHMIDT: Object to  
18 speculation.

The diagram consists of 8 horizontal gray bars of varying lengths and positions, arranged vertically. The bars are set against a light gray background. The bars are arranged in a way that suggests a progression from left to right, with some bars starting and ending at different points relative to a common vertical axis.

Bar Index	Start Position (approx. %)	End Position (approx. %)
1	0	65
2	0	40
3	25	88
4	0	88
5	25	48
6	25	100

■		[REDACTED]
■		[REDACTED]
■		[REDACTED]
■	■	[REDACTED]
■		[REDACTED]
■	■	[REDACTED]
■		[REDACTED]
■	■	[REDACTED]
■		[REDACTED]
■	■	[REDACTED]
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■	[REDACTED]

1 MR. SCHMIDT: Objection.  
2 Foundation.

The image displays a horizontal bar chart with 20 rows. Each row begins with a small, solid gray square. To the right of this square is a gray horizontal bar. The length of these bars varies across the rows, creating a visual sequence. Some rows feature a single bar, while others have multiple bars or gaps, suggesting a complex data structure or a specific pattern of values. The bars are arranged in a way that they generally extend from the left square towards the right, with varying degrees of overlap and spacing.

[illegible]



[REDACTED]

16 Q. Gotcha. You mentioned  
17 Mallinckrodt. I'm going to show you  
18 P-1.1697.

19 (Document marked for  
20 identification as Exhibit  
21 Mahoney-35.)

22 BY MR. BOWDEN:

23 Q. That should be Exhibit  
24 Number 35, which is P-1.1697.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6 And that is a manufacturer of opioids,  
7 correct?

8 A. Mallinckrodt, yes.

9 Q. Okay. And they're a  
10 supplier -- or rather, McKesson is a  
11 purchaser of Mallinckrodt opioids,  
12 correct, for distribution?

13 A. Yes.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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100	100	100	100

■	[REDACTED]
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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 MR. SCHMIDT: Objection.

14 Asked and answered.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

24 MR. SCHMIDT: Objection.

1 Vague.

[REDACTED]

15 MR. SCHMIDT: Objection.

16 Vague.

[REDACTED]

[illegible]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 MR. SCHMIDT: Objection.

9 Foundation.

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

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Reason	Percentage
The company was not growing	100%
The company was not profitable	100%
The company was not successful	100%
The company was not innovative	100%
The company was not ethical	100%
The company was not a good fit	100%
The company was not a good place to work	100%
The company was not a good place to learn	100%
The company was not a good place to be	100%
The company was not a good place to stay	100%
The company was not a good place to work for	100%
The company was not a good place to work for me	100%
The company was not a good place to work for others	100%
The company was not a good place to work for the future	100%
The company was not a good place to work for the past	100%
The company was not a good place to work for the present	100%
The company was not a good place to work for the future and the past	100%
The company was not a good place to work for the future and the present	100%
The company was not a good place to work for the past and the present	100%
The company was not a good place to work for the future, the past, and the present	100%

21 MR. SCHMIDT: Objection.

22 Foundation.

23 THE WITNESS: I -- and I

24 think --

1 BY MR. BOWDEN:

2 Q. I'm not asking the context  
3 of this e-mail.

4 MR. SCHMIDT: Let him finish  
5 his answer, please. I think he  
6 gets to answer your question.

7 You can answer the question.

■

[REDACTED]

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

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[REDACTED]

■

[REDACTED]

■

[REDACTED]

■

[REDACTED]

[REDACTED]

[REDACTED]

■

[REDACTED]

[REDACTED]

■

[REDACTED]

23 MR. SCHMIDT: Objection.

24 Vague.

[illegible]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 Q. Okay. Switching over to --  
8 I'll hand you what I'm marking as  
9 Exhibit Number 36. P-1.1990.

10 (Document marked for  
11 identification as Exhibit  
12 Mahoney-36.)

13 BY MR. BOWDEN:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19 MR. SCHMIDT: Object to  
20 characterization.

21 BY MR. BOWDEN:

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

[REDACTED]

19 A. I'll agree with you what?

20 I'm sorry.

21 Q. Are you having trouble  
22 hearing me or just understanding the  
23 question?

24 A. It was a long question and I





The diagram consists of 20 horizontal gray bars of varying lengths and positions, arranged vertically. The bars are as follows:

- Bar 1: Long, starting at the left edge and ending near the right edge.
- Bar 2: Medium length, starting at the left edge and ending about halfway across.
- Bar 3: Medium length, starting about one-third of the way across and ending about two-thirds of the way across.
- Bar 4: Short, starting about one-third of the way across and ending about halfway across.
- Bar 5: Medium length, starting about one-third of the way across and ending about three-quarters of the way across.
- Bar 6: Long, starting at the left edge and ending at the right edge.
- Bar 7: Long, starting at the left edge and ending at the right edge.
- Bar 8: Long, starting at the left edge and ending near the right edge.
- Bar 9: Medium length, starting at the left edge and ending about halfway across.
- Bar 10: Medium length, starting about one-third of the way across and ending near the right edge.
- Bar 11: Long, starting at the left edge and ending near the right edge.
- Bar 12: Long, starting at the left edge and ending near the right edge.
- Bar 13: Long, starting at the left edge and ending near the right edge.
- Bar 14: Long, starting at the left edge and ending near the right edge.
- Bar 15: Long, starting at the left edge and ending near the right edge.
- Bar 16: Medium length, starting at the left edge and ending about halfway across.
- Bar 17: Medium length, starting about one-third of the way across and ending about two-thirds of the way across.
- Bar 18: Medium length, starting about one-third of the way across and ending near the right edge.
- Bar 19: Long, starting at the left edge and ending near the right edge.
- Bar 20: Long, starting at the left edge and ending near the right edge.

23 Q. Okay. You can set that one  
24 aside.

1 MR. BOWDEN: Off the record  
2 real quick. Can you say the time.

3 THE VIDEOGRAPHER:  
4 44 minutes on the record. And  
5 total 5 hours and 46 minutes.

6 MR. SCHMIDT: That's not  
7 correct. We've been going since  
8 4:01.

9 THE VIDEOGRAPHER: You mean  
10 the time on the record?

11 MR. SCHMIDT: This last  
12 break, we've been going since  
13 4:01. It was the wrong time down.

14 MR. BOWDEN: I just wanted  
15 to use full time. I'm not asking  
16 to take a break.

17 MR. SCHMIDT: Maybe I wrote  
18 down the wrong time. But I  
19 thought we'd been going for six  
20 hours.

21 THE VIDEOGRAPHER: We've  
22 been on the record for 45 minutes.  
23 And the record on the camera is  
24 five hours and 46 minutes.

1                   Should I stop the camera?

2                   MR. SCHMIDT: No, let's stay  
3                   on the record. Unless you want  
4                   to --

5                   MR. BOWDEN: No, I just  
6                   asked to go off to get a count.

7                   MR. SCHMIDT: I might  
8                   have -- just to be clear, I might  
9                   have written down the wrong time.

10                  THE VIDEOGRAPHER: No  
11                  problem.

12                  MR. SCHMIDT: It's just the  
13                  extra 15 minutes at this time of  
14                  day, it felt like it crushed my  
15                  soul. So I had to react.

16                  MR. BOWDEN: I'll withhold  
17                  the comments on the soul.

18                  MR. SCHMIDT: That comes in  
19                  spades, my friend.

20                  MR. BOWDEN: I'll tell you  
21                  what, let's pause for a second.  
22                  I'm cutting down some documents.  
23                  Not to -- I'm not going to leave  
24                  or anything. Go off the record

1                   for a second.

2                   THE VIDEOGRAPHER: The time  
3                   is 5:02 p.m. Off the record.

4                   (Short break.)

5                   THE VIDEOGRAPHER: The time  
6                   is 5:05 p.m. Back on the record.

7 BY MR. BOWDEN:

8                   Q. Sir, you're familiar with  
9                   the HDMA, correct?

10                  A. Yes.

11                  Q. And that was an industry  
12                  organization in which McKesson was a  
13                  member?

14                  A. Yes.

15                  Q. All right. And that  
16                  industry trade group -- is that fair to  
17                  call it an industry trade group?

18                  A. Yes.

19                  Q. -- helped to develop or had  
20                  developed its own guidelines for  
21                  monitoring of suspicious ordering; is  
22                  that right?

23                  A. I think they had worked with  
24                  members in order to collect some best

1 practices, that kind of thing.

█

█

█

█

█

█

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█

█

█

█

[illegible]

■ [REDACTED]  
■ [REDACTED]

3 Q. I'm going to hand you what  
4 I'm marking as Exhibit Number 37,  
5 P1.1941.

6 (Document marked for  
7 identification as Exhibit  
8 Mahoney-37.)

9 BY MR. BOWDEN:

10 Q. This is an e-mail from you,  
11 March 11, 2013, to Don Walker, Bruce  
12 Russell, and Gary Hilliard.

13 Do you see that?

14 A. Yes.

15 Q. And the subject is "HDMA  
16 notes," right?

17 A. Yes.

18 Q. And it says, "Gary and I  
19 attended the HDMA conference last week.  
20 These are my notes. Perhaps the most  
21 surprising revelation was Steve Reardon  
22 and Gilberto Quintero saying Cardinal  
23 does not report suspicious orders to the  
24 DEA, no upside."



1 Do you see where that's  
2 written?

3 A. I do.

4 Q. Do you agree that there's no  
5 upside to reporting suspicious orders to  
6 the DEA?

7 A. You know, I think I --

8 MS. McNAMARA: Objection to  
9 form.

10 MR. SCHMIDT: You can still  
11 answer. Go ahead.

12 THE WITNESS: I believe that  
13 in my writing this, I misspoke.  
14 And I was referring to when they  
15 shut customers down because they  
16 were suspicious customers.

17 BY MR. BOWDEN:

18 Q. When did you come up with  
19 that belief? Is that recent?

20 A. I saw that -- I said  
21 suspicious orders. That isn't what they  
22 said. What we do -- what we did was to  
23 write a letter to the DEA when we were  
24 shutting a customer down. And they said



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14 MR. SCHMIDT: Object to  
15 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

The image is a horizontal bar chart consisting of 20 rows. Each row features a small gray square on the left side. To the right of this square is a larger gray bar. The bars vary in their starting and ending positions across the rows, creating a staggered, abstract pattern. Some rows have a small gray square before the main bar, while others do not. The bars are all the same height but vary in length and horizontal offset.

22 MR. SCHMIDT: Do you want to  
23 review it?

24 THE WITNESS: Yeah, let me



[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. SCHMIDT: Objection.

11 Speculation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6 Q. Okay. I'm going to hand you  
7 what I will mark as Exhibit Number 38,  
8 which is P-1.1806.

9 (Document marked for  
10 identification as Exhibit  
11 Mahoney-38.)

12 BY MR. BOWDEN:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[illegible]

19 MR. SCHMIDT: Objection to  
20 the characterization.

Group	Percentage of respondents
All respondents	~45%
Those who believe the government is responsible	~95%
Those who believe the opposition is responsible	~75%
Those who believe the crisis is due to global factors	~70%

[illegible]

Row	Bar Start (approx. %)	Bar End (approx. %)
1	0	100
2	0	15
3	25	55
4	25	80
5	0	95
6	0	45
7	0	95
8	0	55
9	0	95
10	0	95
11	0	60
12	25	65
13	25	95
14	0	100
15	0	95
16	0	15
17	35	65
18	35	85
19	25	85
20	0	40
21	25	85

21 MR. SCHMIDT: Object to  
22 characterization.

\_\_\_\_\_

\_\_\_\_\_



characterization.

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■		■	[REDACTED]
■	[REDACTED]		[REDACTED]
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■	[REDACTED]		[REDACTED]
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■	[REDACTED]		[REDACTED]
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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. SCHMIDT: Objection.  
11 Mischaracterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18 BY MR. BOWDEN:

19 Q. All right. Sir, I will hand  
20 you what I will mark as Exhibit Number 39  
21 to your deposition. P-1.1971.

22 (Document marked for  
23 identification as Exhibit  
24 Mahoney-39.)





[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5 (Brief white noise  
6 interference.)

7 MR. SCHMIDT: I think the  
8 reporter may not have gotten it.

9 THE COURT REPORTER: Yeah, I  
10 didn't want to ask you to repeat.

11 MR. SCHMIDT: And I wasn't  
12 jumping on your question, but I  
13 could just see...

14 MR. BOWDEN: That's okay.  
15 Let me re-ask it then.

16 BY MR. BOWDEN:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

1 MR. SCHMIDT: Let him finish  
2 his answer, please.

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

■	[REDACTED]	[REDACTED]
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■	■	[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11 MR. SCHMIDT: Objection to  
12 the assumption.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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97	97	97	97
98	98	98	98
99	99	99	99
100	100	100	100

	Category	Sub-category	Value	Unit
1	Category 1	Sub-category 1	100	%
2	Category 1	Sub-category 2	85	%
3	Category 1	Sub-category 3	75	%
4	Category 1	Sub-category 4	65	%
5	Category 1	Sub-category 5	55	%
6	Category 1	Sub-category 6	45	%
7	Category 2	Sub-category 1	90	%
8	Category 2	Sub-category 2	80	%
9	Category 2	Sub-category 3	70	%
10	Category 2	Sub-category 4	60	%
11	Category 2	Sub-category 5	50	%
12	Category 2	Sub-category 6	40	%
13	Category 3	Sub-category 1	80	%
14	Category 3	Sub-category 2	70	%
15	Category 3	Sub-category 3	60	%
16	Category 3	Sub-category 4	50	%
17	Category 3	Sub-category 5	40	%
18	Category 3	Sub-category 6	30	%
19	Category 4	Sub-category 1	70	%
20	Category 4	Sub-category 2	60	%
21	Category 4	Sub-category 3	50	%
22	Category 4	Sub-category 4	40	%
23	Category 4	Sub-category 5	30	%
24	Category 4	Sub-category 6	20	%
25	Category 5	Sub-category 1	60	%
26	Category 5	Sub-category 2	50	%
27	Category 5	Sub-category 3	40	%
28	Category 5	Sub-category 4	30	%
29	Category 5	Sub-category 5	20	%
30	Category 5	Sub-category 6	10	%

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15 MR. SCHMIDT: Object to the  
16 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6 MR. SCHMIDT: Objection to  
7 the characterization.

[REDACTED]

20 Q. I'll hand you what I'll mark  
21 as Exhibit Number 40.

22 (Document marked for  
23 identification as Exhibit  
24 Mahoney-40.)





[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11 Do you see that?

12 A. Yes.

13 MR. SCHMIDT: Did you mean  
14 to give him a highlighted copy?

15 MR. BOWDEN: Absolutely not.

16 MR. SCHMIDT: Okay. I just  
17 saw that. Why don't we just move  
18 the sticker over if you want. You  
19 can give me a clean copy because I  
20 already started writing on mine.

21 Do you have a clean copy  
22 that you can give us back?

23 MR. BOWDEN: I appreciate  
24 the candor.

1 MR. SCHMIDT: All right. He  
2 was on Page 11.

3 MR. BOWDEN: Thank you.

4 BY MR. BOWDEN:

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

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[REDACTED]

19 MR. SCHMIDT: Object to the  
20 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]











[REDACTED]

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[REDACTED]

[illegible]

18 MR. SCHMIDT: Objection.

19 Foundation.

20 BY MR. BOWDEN:

Response	Percentage
U.S. should take action	85%
U.S. should not take action	15%

24 MR. SCHMIDT: Objection.

### Characterization.

Page 467

Row	Bar Start (approx. %)	Bar End (approx. %)
1	0	85
2	0	95
3	0	65
4	35	85
5	0	25
6	25	50
7	25	75
8	0	100
9	0	75
10	0	100
11	0	95
12	0	88
13	0	80
14	0	90
15	0	95
16	0	80
17	0	95
18	0	95
19	0	40
20	35	85
21	0	100
22	0	88
23	0	78
24	0	85
25	0	50

The diagram illustrates a sequence of 28 time steps, each represented by a small square on the left and a horizontal bar indicating the spatial extent of a signal. The bars vary in their vertical position and horizontal length across the sequence.

Row	Bar Position (approx. % of total height)	Bar Length (approx. % of total width)
1	10	85
2	6	25
3	10	15
4	10	80
5	10	85
6	10	87
7	10	75
8	10	35
9	10	75
10	10	25
11	10	65
12	10	95
13	10	55
14	10	85
15	10	95
16	10	85
17	10	90
18	10	85
19	10	75
20	10	25
21	10	15
22	10	85
23	10	90
24	10	90
25	10	85
26	10	90
27	10	85
28	10	85

[illegible]

The diagram consists of a vertical list of 25 items. Each item is represented by a small square icon to its left and a horizontal bar of varying length and position. The bars are gray and set against a white background. The items are arranged in a vertical sequence, with some bars starting at the same vertical position and others starting at different positions, suggesting a timeline or a sequence of events.

■	[REDACTED]
■	[REDACTED]
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■	[REDACTED]
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■	[REDACTED]
■	[REDACTED]



[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

8 MR. SCHMIDT: Object to the  
9 characterization.

[REDACTED] [REDACTED]

[REDACTED]

12 BY MR. BOWDEN:

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18 Q. I'm going to hand you what  
19 I'll mark as Exhibit Number 42.

20 (Document marked for  
21 identification as Exhibit  
22 Mahoney-42.)

23 BY MR. BOWDEN:

24 Q. On the first page, you can

1 see this is the administrative memorandum  
2 of agreement. It's between the DEA and  
3 McKesson Corporation, right?

4 A. Yes.

5 Q. And in the background  
6 section, in Section Number 5, you can see  
7 that there were -- read that together.  
8 "Between March 2013 and the present, DEA  
9 executed one additional AIW and served  
10 numerous administrative subpoenas and  
11 conducted a number of cyclic inspections  
12 at various McKesson U.S. pharmaceutical  
13 distribution centers Nationwide,  
14 including McKesson Washington Courthouse,  
15 Ohio, distribution center, McKesson  
16 Livonia, Lakeland, and Aurora."

17 Do you see that?

18 A. Yes.

19 Q. On Page 2, you see Bullet  
20 Point Number 7?

21 A. Page 2, Number 7.

22 Q. It cites that, "On" -- "On  
23 or about November 14, 2014, McKesson  
24 received a letter dated November 4, 2014,

1 from the DEA stating the DEA was  
2 separately pursuing administrative action  
3 against McKesson-Aurora for the conduct  
4 outlined in the August 13, 2014, letter."

5 Do you see that?

6 A. Yes.

7 Q. And they go --

8 A. The prior letter?

9 Q. Right.

10 A. Okay.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

■ [REDACTED]

2 Q. Go on to Page 3. As part of  
3 this agreement, McKesson did accept  
4 responsibility. You're aware of that,  
5 right?

6 A. I'm not sure the details of  
7 the settlement.

8 Q. Well, let's look at  
9 bullet --

10 A. You're talking about Number  
11 2 there?

12 Q. Right. Number 2, acceptance  
13 of responsibility.

14 A. Mm-hmm.

15 Q. The -- halfway down, it  
16 says, "McKesson acknowledges that at  
17 various times during the period from  
18 January 1, 2009, up through and including  
19 the effective date of this agreement, it  
20 did not identify or report to DEA certain  
21 orders placed by certain pharmacies which  
22 should have been detected by McKesson as  
23 suspicious based on the guidance  
24 contained in the DEA letters about the

1 requirements set forth in the CSA, right?

2 A. Yes.

3 Q. Underneath that on or  
4 about -- excuse me. Strike that.

█

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MR. SCHMIDT: Object to the

12

characterization.

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[REDACTED]

2 MR. SCHMIDT: Object to the  
3 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15 MR. SCHMIDT: Object to the  
16 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. SCHMIDT: Same  
11 objection.

12 THE WITNESS: Can you repeat  
13 the question?

14 BY MR. BOWDEN:

15 Q. Sure. Another item they  
16 took issue with was the fact that  
17 McKesson should have been reporting  
18 suspicious orders and was failing to do  
19 so, right?

20 A. Yes.

21 Q. And if you go down to the  
22 bottom of Page 3, says, "McKesson failed  
23 to maintain effective controls against  
24 diversion of particularly controlled



1 substances into other legitimate medical,  
2 scientific, and industrial channels by  
3 sales of certain" -- "by sales to certain  
4 of its customers in violation of the CSA  
5 and the CSA implementing regulations."

6 Do you see that?

7 A. Yes.

8 Q. And then it gives a list of  
9 some of those distribution centers that  
10 failed to maintain effective controls  
11 against diversions, right?

12 A. Yes.

13 Q. And Lakeland, Florida, is  
14 one of those distribution centers, right?

15 A. I see that.

16 Q. And Lakeland, Florida, was  
17 one of the distribution -- distribution  
18 centers of which you had responsibility  
19 for during that time period, right?

20 A. Yes.

21 Q. In fact, during that entire  
22 time period from 2008 up until this  
23 agreement was signed in 2017, you had  
24 responsibility for Lakeland, Florida,

1 right?

2 A. From a regulatory  
3 perspective?

4 Q. Correct.

5 A. Yes.

6 Q. Now, as a result of this  
7 action, if you turn to Page 7, bullet  
8 point G. G, yes.

9 "McKesson agrees that its  
10 authority to distribute controlled  
11 substances containing the drug code for  
12 Schedule II hydromorphone products, that  
13 is DEA drug code 9150 from its  
14 McKesson-Lakeland distribution center,  
15 DEA certificate of registration  
16 PM0000771, will be suspended for a period  
17 of one year commencing from the effective  
18 date of the agreement except for orders  
19 placed by permitted registrants."

20 Do you see that there?

21 A. I do.

22 Q. So as part of the penalty  
23 for Lakeland distribution center not  
24 appropriately sending suspicious order

1 reports to the DEA, their license to  
2 distribution center Schedule II products  
3 was suspended for a period of one year,  
4 right?

5 MR. SCHMIDT: I'll object to  
6 the characterization.

7 THE WITNESS: Hydrocodone,  
8 or hydromorphone?

9 BY MR. BOWDEN:

10 Q. Hydromorphone.

11 A. Was suspended for one year.  
12 So that was a very narrow -- that's --  
13 that's one base code.

█ █ █ █

█ █

█ █

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18 Q. Okay. And ultimately, as a  
19 result of the settlement agreement,  
20 McKesson agreed to pay \$150 million fine,  
21 correct?

22 A. Yes.

23 MR. BOWDEN: Take a break.

24 THE VIDEOGRAPHER: Remove

1                   your microphones. The time is  
2                   6:02 p.m. Going off the record.  
3                   (Short break.)

4                   THE VIDEOGRAPHER: We are  
5                   back on the record. The time is  
6                   6:14 p.m.

7                                   -   -   -

8                                   EXAMINATION

9                                   -   -   -

10           BY MR. SCHMIDT:

11                   Q.       Mr. Mahoney, my name is Paul  
12                   Schmidt. I represent McKesson in this  
13                   case. We've been here for a very long  
14                   day. We're now into the evening, and  
15                   upside, so I'm going to be targeted in my  
16                   questions to you.

17                               Can you tell the jury how  
18                   long you have been at McKesson.

19                   A.       Almost 18 years. 17 to  
20                   18 years.

21                   Q.       And what is it about your  
22                   work at McKesson that's made you stay  
23                   there for that period of time?

24                   A.       Has good culture, and I

1 think the mission is something that I  
2 enjoy, empowering healthcare.

3 Q. Can you describe for the  
4 jury the role that McKesson  
5 Pharmaceutical place in how prescription  
6 medicines get from the companies that  
7 make them to patients?

8 A. McKesson buys  
9 pharmaceuticals from lots of different  
10 manufacturers and brings them into our  
11 local DC where customers, i.e.,  
12 pharmacies and hospitals, are able to  
13 order them for next-day delivery so they  
14 have them when they need them.

15 Q. Does McKesson  
16 Pharmaceutical's work focus on  
17 interacting directly with doctors?

18 A. Not generally, no.

19 Q. Do you have an understanding  
20 of -- about whether when McKesson ships a  
21 prescription medicine to a pharmacy, a  
22 patient is only able to get that medicine  
23 from the pharmacy if they've seen a  
24 doctor and the doctor has made a judgment

1       that that patient should get a  
2       prescription for that medicine?

3                       MR. BOGLE:   Object to form.

4                       THE WITNESS:   McKesson  
5                       provides the supply for pharmacies  
6                       who are responding to scripts that  
7                       patients bring them generated by a  
8                       doctor.

9       BY MR. SCHMIDT:

10               Q.       If a physician is writing  
11       more prescriptions for opioids, does that  
12       increase the overall distribution level  
13       for opioids?

14                       MR. BOGLE:   Object to form.

15                       THE WITNESS:   Can you repeat  
16                       that.

17       BY MR. SCHMIDT:

18               Q.       Yeah, if physicians write  
19       more prescriptions for opioids, does that  
20       increase the overall level of  
21       distribution of opioids?

22               A.       Yes.

23                       MR. BOGLE:   Object to form.

24       BY MR. SCHMIDT:

1           Q.     Does your level of  
2     distribution follow from what  
3     prescriptions do, or do you actually  
4     influence what prescriptions -- what  
5     physicians do?

6                     MR. BOGLE:   Object to form.

7     BY MR. SCHMIDT:

8           Q.     And let me re-ask it.   I  
9     think I misspoke in my question.

10                    Does your level of  
11    distribution follow from decisions that  
12    physicians make, or do you actually  
13    influence the decisions physicians  
14    make --

15                    MR. BOGLE:   Object to form.

16    BY MR. SCHMIDT:

17           Q.     -- in terms of prescribing  
18    medicines?

19           A.     In the distribution center  
20    we don't have any influence on  
21    prescribing habits.   We are just  
22    responding to what is pulled from us by  
23    the pharmacies.

24           Q.     Is this role that you've

1     been talking about true for opioids as  
2     well as other prescription medicines that  
3     McKesson distributes?

4             A.     Yes.

5             Q.     And can you give us a sense  
6     of whether, from your experience, opioids  
7     are a substantial majority, a majority, a  
8     minority, a substantial minority of the  
9     medicines that McKesson distributes?

10            MR. BOGLE:   Object to form.

11            THE WITNESS:   Substantial  
12            minority.

13     BY MR. SCHMIDT:

14            Q.     Do you have an understanding  
15     of the responsibility that a pharmacy has  
16     in terms of when they pass along an  
17     opioid to a patient that they have  
18     purchased from McKesson?

19            A.     Do I --

20            MR. BOGLE:   Object to form.

21     BY MR. SCHMIDT:

22            Q.     Do you understand the  
23     responsibility that a pharmacy has when  
24     they pass along an opioid purchased from



1 McKesson to a patient?

2 A. Yes. They have  
3 corresponding responsibility.

4 Q. Is part of your work -- does  
5 part of your work involve trying to  
6 identify where pharmacies might not be  
7 meeting their responsibilities in terms  
8 of whether you interact with those  
9 pharmacies?

10 A. Yes.

11 Q. And you've discussed  
12 McKesson's regulatory programs today. Am  
13 I understanding correctly from your  
14 testimony over the course of the day that  
15 McKesson's programs for doing diligence  
16 into pharmacies have changed over time?

17 A. Yes.

18 Q. Have developed?

19 A. Yes.

20 Q. What are those changes made  
21 in response to?

22 A. They've been made to give us  
23 greater granularity of what we see in a  
24 pharmacy as they are buying from us and

1 dispensing to their patients.

2 Q. Are those changes made as  
3 you develop more information about  
4 practices with regards to opioids,  
5 concerns about diversions, information  
6 you get from your diligence, things like  
7 that?

8 MR. BOGLE: Object to form.

9 THE WITNESS: Yes.

10 BY MR. SCHMIDT:

11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]

16 Q. Do you have a view as to  
17 whether that's a good thing to try to  
18 improve your processes over time?

19 MR. BOGLE: Object to form.

20 THE WITNESS: It's  
21 absolutely a good thing.

22 BY MR. SCHMIDT:

23 Q. Let's take one example. You  
24 have Exhibit 26, please.

1 MR. BOGLE: Can you give me  
2 the corresponding -- the other  
3 exhibit number at the bottom?

4 MR. SCHMIDT: The Bates  
5 number?

6 MR. BOGLE: No.

7 MR. SCHMIDT: It's 1743, I  
8 think you're thinking of.

9 MR. BOGLE: Yeah.

10 BY MR. SCHMIDT:

11 Q. And if you look at Page 26  
12 of this exhibit.

13 A. 26?

[REDACTED]

Government	Percentage
Current government	85%
Previous government	15%

6 MR. BOGLE: Object to form.

A 15x3 grid of gray rectangles. The rectangles vary in their horizontal and vertical dimensions and are positioned at different offsets within the grid cells, creating a pattern similar to a barcode or a data visualization. The grid is composed of 15 rows and 3 columns.

6



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. BOGLE: Object to form.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

11 MR. BOGLE: Object to form.

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[illegible]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14

MR. BOGLE: Object to form.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Category	Percentage
1. Very satisfied	85%
2. Satisfied	95%
3. Dissatisfied	25%
4. Very dissatisfied	75%
5. Don't know	10%
6. Very satisfied	95%
7. Satisfied	65%
8. Dissatisfied	35%
9. Very dissatisfied	95%
10. Don't know	10%
11. Very satisfied	85%
12. Satisfied	95%
13. Dissatisfied	25%
14. Very dissatisfied	75%
15. Don't know	10%
16. Very satisfied	95%
17. Satisfied	65%
18. Dissatisfied	35%
19. Very dissatisfied	95%
20. Don't know	10%
21. Very satisfied	85%
22. Satisfied	95%
23. Dissatisfied	25%
24. Very dissatisfied	75%
25. Don't know	10%
26. Very satisfied	95%
27. Satisfied	65%
28. Dissatisfied	35%
29. Very dissatisfied	95%
30. Don't know	10%
31. Very satisfied	85%
32. Satisfied	95%
33. Dissatisfied	25%
34. Very dissatisfied	75%
35. Don't know	10%
36. Very satisfied	95%
37. Satisfied	65%
38. Dissatisfied	35%
39. Very dissatisfied	95%
40. Don't know	10%
41. Very satisfied	85%
42. Satisfied	95%
43. Dissatisfied	25%
44. Very dissatisfied	75%
45. Don't know	10%
46. Very satisfied	95%
47. Satisfied	65%
48. Dissatisfied	35%
49. Very dissatisfied	95%
50. Don't know	10%
51. Very satisfied	85%
52. Satisfied	95%
53. Dissatisfied	25%
54. Very dissatisfied	75%
55. Don't know	10%
56. Very satisfied	95%
57. Satisfied	65%
58. Dissatisfied	35%
59. Very dissatisfied	95%
60. Don't know	10%
61. Very satisfied	85%
62. Satisfied	95%
63. Dissatisfied	25%
64. Very dissatisfied	75%
65. Don't know	10%
66. Very satisfied	95%
67. Satisfied	65%
68. Dissatisfied	35%
69. Very dissatisfied	95%
70. Don't know	10%
71. Very satisfied	85%
72. Satisfied	95%
73. Dissatisfied	25%
74. Very dissatisfied	75%
75. Don't know	10%
76. Very satisfied	95%
77. Satisfied	65%
78. Dissatisfied	35%
79. Very dissatisfied	95%
80. Don't know	10%
81. Very satisfied	85%
82. Satisfied	95%
83. Dissatisfied	25%
84. Very dissatisfied	75%
85. Don't know	10%
86. Very satisfied	95%
87. Satisfied	65%
88. Dissatisfied	35%
89. Very dissatisfied	95%
90. Don't know	10%
91. Very satisfied	85%
92. Satisfied	95%
93. Dissatisfied	25%
94. Very dissatisfied	75%
95. Don't know	10%
96. Very satisfied	95%
97. Satisfied	65%
98. Dissatisfied	35%
99. Very dissatisfied	95%
100. Don't know	10%

[REDACTED]

[REDACTED]

3 MR. BOGLE: Object to form.

4 BY MR. SCHMIDT:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 BY MR. SCHMIDT:

[REDACTED]

[REDACTED]

[REDACTED]

21 MR. BOGLE: Object to form.

22 BY MR. SCHMIDT:

[REDACTED]

[REDACTED]

■	[REDACTED]				
■		■	[REDACTED]		
■		■	[REDACTED]		
■	[REDACTED]				
■		■	[REDACTED]		
■	[REDACTED]				
■	[REDACTED]	[REDACTED]			
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]				
■		■	[REDACTED]		
■		■	[REDACTED]		
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]				
■		■	[REDACTED]		
■	[REDACTED]				
■		■	[REDACTED]		
■		■	[REDACTED]		
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]				
■	[REDACTED]				
■		■	[REDACTED]		

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83																	

3 MR. BOGLE: Object to form.

6 BY MR. SCHMIDT:

7 Q. Do you have Exhibit 1 handy?  
8 Do you remember being asked questions  
9 about this 2006 letter from the DEA by  
10 the plaintiff lawyer?

11                    A.        Yes.

Q. And if you look at the second page of this letter -- it's 1464. If you look at the second page of this letter, about halfway down the letter, before and after the block quote is language getting at this idea of blocking orders. Do you see that? Do you remember being asked questions about that?

21                   A.       Yes.



[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

14 MR. BOGLE: Object to form.

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]



Response	Percentage
U.S. should take action	85%
U.S. should not take action	15%

7 MR. BOGLE: Object to form.

Response	Percentage
U.S. should take action	10%
U.S. should take action	20%
U.S. should take action	30%
U.S. should take action	40%
U.S. should take action	50%
U.S. should take action	60%
U.S. should take action	70%
U.S. should take action	80%
U.S. should take action	90%
U.S. should not take action	10%
U.S. should not take action	20%
U.S. should not take action	30%
U.S. should not take action	40%
U.S. should not take action	50%
U.S. should not take action	60%
U.S. should not take action	70%
U.S. should not take action	80%
U.S. should not take action	90%

22 MR. BOGLE: Object to form.

[illegible]

Row	Bar Length (approx. %)
1	95
2	45
3	40
4	10
5	15
6	98
7	92
8	75
9	10
10	98
11	10
12	10
13	15
14	80
15	10
16	90
17	98
18	98
19	10
20	15
21	10
22	15
23	10
24	10
25	10
26	10
27	10
28	10
29	10
30	10

22 Q. In the time that you've  
23 served as director of regulatory affairs,  
24 am I correct that your territory is



[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9 MR. BOGLE: Object to form.

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A horizontal bar chart with 20 rows. Each row features a small square icon on the left and a gray bar of varying length and position. The bars represent different data points or categories, with some spanning the entire width and others being shorter and offset.

22 MR. BOGLE: Object to form.

23 BY MR. SCHMIDT:

24 Q. So let me re-ask the

<sup>1</sup> question.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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Journal compilation © 2006 Blackwell Publishing Ltd

Response	Percentage
Yes	65%
No	25%
Don't know	10%

■ ■ ■

\_\_\_\_\_

Response	Percentage
Yes, the current system is the best way to run the country	55%
No, the current system is not the best way to run the country	45%

\_\_\_\_\_

**□** \_\_\_\_\_

[illegible]

\_\_\_\_\_

\_\_\_\_\_

**□** \_\_\_\_\_

[illegible]

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

10 of 11

Government	Percentage
Current government	85%
Previous government	15%

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

8 MR. SCHMIDT: Does someone  
9 have the last exhibit number?  
10 I'll call this Exhibit 50.

11 (Document marked for  
12 identification as Exhibit  
13 Mahoney-50.)

14 BY MR. SCHMIDT:

15 Q. I've marked as Exhibit 50 a  
16 document --

17 MR. SCHMIDT: I'll pass it  
18 down. I'm sorry, I need that  
19 back. Apologies.

20 BY MR. SCHMIDT:

21 Q. I've marked as Exhibit 50 a

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[illegible]





[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. BOGLE: Object to form.

11 BY MR. SCHMIDT:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

11 MR. BOGLE: Object to form.

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

4 Q. I've marked as Exhibit 51 --

5 MR. SCHMIDT: Thank you.

6 (Document marked for

7 identification as Exhibit

8 Mahoney-51.)

9 BY MR. SCHMIDT:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1	2	3
4	5	6
7	8	9
10	11	12
13	14	15
16	17	18
19	20	21
22	23	24
25	26	27
28	29	30
31	32	33
34	35	36
37	38	39
40	41	42
43	44	45
46	47	48
49	50	51
52	53	54
55	56	57
58	59	60
61	62	63
64	65	66
67	68	69
70	71	72
73	74	75
76	77	78
79	80	81
82	83	84
85	86	87
88	89	90
91	92	93
94	95	96
97	98	99
100	101	102

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 MR. BOGLE: Object to form.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14 MR. BOGLE: Object to form.

15 BY MR. SCHMIDT:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 First off, prior to 2006,  
9 was Lakeland responsible for supplying  
10 opioids to Summit County, Ohio or  
11 Cuyahoga County, Ohio?

12 A. No.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

21 MR. BOGLE: Object to form.

22 BY MR. SCHMIDT:

[REDACTED]

[REDACTED]

█

[REDACTED]

█

█

[REDACTED]

█

█

[REDACTED]

█

[REDACTED]

5

MR. BOGLE: Object to form.

█

[REDACTED]

[REDACTED]

█

[REDACTED]

█

█

[REDACTED]

[REDACTED]

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

█

[REDACTED]

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[REDACTED]

█

[REDACTED]

█

█

[REDACTED]

█

[REDACTED]

█

[REDACTED]

[illegible]

21 MR. BOGLE: Object to form.

Response	Percentage
U.S. should take action to reduce greenhouse gas emissions	78%
U.S. should not take action to reduce greenhouse gas emissions	18%
U.S. should take action to reduce greenhouse gas emissions, but only if it can be done without harming the economy	4%

■	[REDACTED]		
■		■	■
■		■	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■		■	■
■		■	[REDACTED]
■	[REDACTED]		[REDACTED]
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■	[REDACTED]		
■		■	■
■		■	[REDACTED]
■	[REDACTED]		
■		■	■
■		■	[REDACTED]
■	[REDACTED]		
■		■	■
■		■	[REDACTED]
■	[REDACTED]		
■		■	[REDACTED]
■	[REDACTED]		
■		■	[REDACTED]
■	[REDACTED]		
■	[REDACTED]		

[illegible]

16 MR. BOGLE: Object to form.

Age Group	I don't know	I would not	I would	I would definitely
18-24	10%	10%	10%	70%
25-34	10%	10%	10%	70%
35-44	10%	10%	10%	70%
45-54	10%	10%	10%	70%
55-64	10%	10%	10%	70%
65-74	10%	10%	10%	70%
75-84	10%	10%	10%	70%
85+	10%	10%	10%	70%

The image displays a vertical sequence of 12 horizontal gray bars. Each bar is preceded by a small gray square, creating a list-like structure. The bars vary in their starting and ending horizontal positions, suggesting a timeline or a sequence of events. The bars are arranged in a way that they appear to be part of a larger, continuous flow, with some bars starting further to the right than others, indicating a staggered or sequential process.

14 MR. BOGLE: Object to form.

[illegible]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

4 Q. Let's look at Exhibit 9,

[REDACTED]

[REDACTED]

7 Do you see that?

8 A. Yes.

9 MR. BOGLE: What's the --  
10 what's the number?

11 MR. SCHMIDT: 1963.

12 BY MR. SCHMIDT:

13 Q. Do you see that,  
14 Mr. Mahoney?

15 A. Yes.

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]





\_\_\_\_\_

Response	Percentage
Yes, the U.S. should take action to address climate change	85%
No, the U.S. should not take action to address climate change	15%

Age Group	Percentage
18-24	10%
25-34	15%
35-44	25%
45-54	30%
55-64	15%
65-74	10%
75-84	5%
85+	5%

\_\_\_\_\_

5 MR. BOGLE: Object to form.

Age Group	Percentage
18-24	~5%
25-34	~35%
35-44	~25%
45-54	~20%
55-64	~15%
65-74	~10%
75-84	~8%
85+	~5%

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Age Group	Percentage
18-24	10%
25-34	20%
35-44	30%
45-54	25%
55-64	15%
65-74	10%
75-84	5%
85+	5%

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**THE UNIVERSITY OF CHICAGO**

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Category	Percentage
1. 100%	100%
2. 100%	100%
3. 100%	100%
4. 100%	100%
5. 100%	100%
6. 100%	100%
7. 100%	100%
8. 100%	100%
9. 100%	100%
10. 100%	100%
11. 100%	100%
12. 100%	100%

14 MR. BOGLE: Objection to  
15 form.

Age Group	Male (%)	Female (%)
18-24	10	10
25-34	20	20
35-44	40	40
45-54	30	70
55-64	60	90
65+	20	20

A horizontal bar chart with 20 rows. Each row features a small gray square on the left side, followed by a gray bar of varying length. The bars are arranged in a pattern that suggests a sequence or progression, with some rows having multiple bars or gaps.

21 MR. BOGLE: Object to form.

Age Group	Percentage
18-29	85%
30-49	75%
50-69	70%
70+	65%

A vertical timeline consisting of 20 rows. Each row features a small, solid gray square icon on the left side. To the right of each icon is a horizontal gray bar. The bars vary in their starting and ending horizontal positions, creating a staggered effect across the rows. Some bars span the entire width of the container, while others are shorter and positioned at different offsets. The overall layout suggests a sequence of events or data points over time.

21 Q. Let me ask you about a  
22 couple other exhibits. Exhibit 11,  
23 please.

24 Do you have that in front of

1       you?

2                               MR. BOGLE:   What's the  
3                               cross-reference?

4                               MR. SCHMIDT:   1947.

5       BY MR. SCHMIDT:

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MR. BOGLE: Object to form.

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[REDACTED]

18 Q. Do you have Exhibit 16 and  
19 17 in front of you?

20 A. Yes.

21 Q. These are, I believe, web  
22 page articles that the plaintiff lawyer  
23 said he pulled down and asked you  
24 questions about. Do you have any way to





Age Group	Should Take Action	Should Not Take Action
18-29	85%	15%
30-49	85%	15%
50-69	85%	15%
70+	85%	15%

5 MR. BOGLE: Object to form.

6 BY MR. SCHMIDT:

7 Q. Do you have in front of you  
8 Exhibit 19, the agreement in 2008?

9 A. Yes.

10 Q. Look with me if you would at  
11 Page 2 of the document. It's 889. Do  
12 you see where it says, "No admission or  
13 concession"?

14                    A.        Yes.

15 Q. Tell me if I read this  
16 correctly: "This agreement is neither an  
17 admission by McKesson of liability or of  
18 any allegations made by DEA in the orders  
19 and investigations nor a concession by  
20 DEA that its allegations in the orders of  
21 investigations are not well founded."

22 Did I read that correctly?

23                   A.       Yes.

24 Q. If you look at Page 0714 of

1 this document. Down below. 14 at the  
2 top?

3 A. That's easier.

4 Q. I'm going to read  
5 Paragraph 9 and ask you if I've read this  
6 correctly. "By entering into this  
7 agreement McKesson does not admit to the  
8 violations alleged as a result of any DEA  
9 investigation or to any violation of law,  
10 liability, fault, misconduct or  
11 wrongdoing. McKesson explicitly denies  
12 any allegations of violations of the CSA  
13 or DEA regulations and represents that  
14 the company has defenses to the  
15 violations alleged by the government."

16 Did I read that correctly?

17 A. Yes.

18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]

22 MR. BOGLE: Object to form.

23 BY MR. SCHMIDT:

24 Q. Just a few more.



[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 MR. BOGLE: Object to form.

13 BY MR. SCHMIDT:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

22 MR. BOGLE: Object to form.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16 MR. BOGLE: Sorry, what was

17 the cross-reference?

18 MR. SCHMIDT: 1355.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Row	Bar Length (approx. % of total width)
1	85
2	80
3	100
4	25
5	65
6	20
7	100
8	95
9	25
10	95
11	90
12	95
13	15
14	20
15	95

17 MR. BOGLE: Object to form.

[illegible]

21 MR. BOGLE: Object to form.

Age Group	Percentage
18-29	80%
30-49	75%
50-64	65%
65 and older	55%



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 BY MR. SCHMIDT:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The diagram consists of 15 horizontal gray bars of varying lengths and positions, arranged in a staggered fashion. The bars are organized into four groups based on their vertical alignment:

- Group 1 (Top):** Four bars starting at the same left point but ending at different points on the right.
- Group 2:** Four bars starting at different points on the left but ending at the same point on the right.
- Group 3:** Four bars starting at the same left point and ending at the same point on the right, but with different vertical offsets.
- Group 4 (Bottom):** Three bars starting at different points on the left and ending at different points on the right.

The bars are gray and set against a white background. The overall arrangement suggests a timeline or a sequence of events where different elements have varying durations and start/end times.

16 MR. BOGLE: Object to form.

Age Group	Percentage
18-29	90%
30-49	88%
50-64	85%
65-74	82%
75+	78%

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16

MR. BOGLE: Object to form.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15

MR. BOGLE: Object to form.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11 MR. SCHMIDT: That's all I  
12 have, Mr. Mahoney. Thank you.

13 MR. BOGLE: I've got some  
14 follow-up, and you guys have a  
15 chance to ask questions if you  
16 want. I just want to mark the  
17 time. Let's go off the record.

18 THE VIDEOGRAPHER: Sure.  
19 Okay. The time is 7:05 p.m.  
20 Going off the record.

21 (Short break.)

22 THE VIDEOGRAPHER: We are  
23 back on the record. The time is  
24 7:09 p.m.

1

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2

EXAMINATION

3

- - -

4

BY MR. BOGLE:

5

Q. Mr. Mahoney, I have a few

6

follow-up questions for you. I know you

7

probably want to get out of here. So you

8

were asked some questions about when

9

McKesson supplies drugs to pharmacies. I

10

think you provided testimony along the

11

lines of that McKesson only distributes

12

when there's a prescription from a

13

doctor, right?

14

A. I think what I was saying is

15

that we -- we don't -- we don't push the

16

drugs. We respond to orders from

17

pharmacists who are filling scripts from

18

doctors.

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 MR. SCHMIDT: Objection.

9 Foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



1 MR. SCHMIDT: Objection.

2 Form.

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13 MR. SCHMIDT: Objection.

14 Form.

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21 MR. SCHMIDT: Objection.  
22 Characterization.

Category	Domestic terrorism	International terrorism
Total	~65%	~60%
U.S.-born	~60%	~55%

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. SCHMIDT: Objection.

11 Characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15 MR. SCHMIDT: Objection to  
16 the characterization.

17 BY MR. BOGLE:

18 Q. You recall that discussion,  
19 don't you?

20 A. Yes, I recall that  
21 discussion.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13 Q. Okay. And you were asked  
14 some questions about the 2008 settlement  
15 agreement and whether McKesson accepted  
16 liability or responsibility for those  
17 actions outlined in the agreement. Do  
18 you recall that?

19 A. Yes.

20 Q. Okay. I believe you  
21 testified that there was no admission of  
22 guilt. Something to that effect, right?

23 A. That was just asked, right?

24 Q. Right, right. By your





[REDACTED]

6 MR. SCHMIDT: Objection,  
7 calls --

8 BY MR. BOGLE:

9 Q. They didn't have to settle?

10 MR. SCHMIDT: Objection.  
11 Calls for a legal conclusion.

12 BY MR. BOGLE:

13 Q. True?

14 A. That's my understanding.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 Q. You were asked -- I'm trying  
8 to find the exhibit number. 1.1962 which  
9 is Exhibit 25. If you can track that one  
10 down.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. SCHMIDT: Objection.

11 Foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5 MR. SCHMIDT: Object to the  
6 preamble; move to strike the  
7 preamble. Object to form.

8 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

22 MR. SCHMIDT: Objection to  
23 form.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 MR. SCHMIDT: Objection to  
13 form.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23 MR. SCHMIDT: Objection.

24 Foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 MR. SCHMIDT: Objection.

8 Vague.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 MR. SCHMIDT: Objection.

18 Form.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 MR. SCHMIDT: Objection.

9 Form.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

24 MR. SCHMIDT: Objection.

1 Form. Vague as to time.

2 BY MR. BOGLE:

3 Q. Any time.

4 MR. SCHMIDT: Objection to  
5 form.

6 BY MR. BOGLE:

■ ■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

20 MR. SCHMIDT: Objection.

21 Asked and answered three or four  
22 times now.

■ [REDACTED] [REDACTED]

■ [REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7 MR. SCHMIDT: Objection.

8 Form. Foundation.

9 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 MR. SCHMIDT: Let him finish  
2 his answer, please.

█ [REDACTED] [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]

13 MR. SCHMIDT: Objection.  
14 Form. Asked and answered.

█ [REDACTED] [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6 MR. SCHMIDT: Objection.

7 Foundation. Vague as to time.

8 BY MR. BOGLE:

9 Q. Anytime.

10 MR. SCHMIDT: Objection.

11 Foundation. Asked and answered.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



A horizontal bar chart with 20 rows of data. Each row is represented by a small square marker on the left. The bars are colored in various shades of gray. The chart shows the percentage of respondents for different categories. The categories are represented by different shades of gray. The chart is organized into 10 groups of 2 rows each. The first group has two long bars. The second group has two bars of medium length. The third group has two bars of medium length. The fourth group has two bars of medium length. The fifth group has two bars of medium length. The sixth group has two bars of medium length. The seventh group has two bars of medium length. The eighth group has two bars of medium length. The ninth group has two bars of medium length. The tenth group has two bars of medium length.

Category	Percentage
Category 1	95%
Category 2	70%
Category 3	25%
Category 4	25%
Category 5	25%
Category 6	25%
Category 7	25%
Category 8	25%
Category 9	25%
Category 10	25%
Category 11	25%
Category 12	25%
Category 13	25%
Category 14	25%
Category 15	25%
Category 16	25%
Category 17	25%
Category 18	25%
Category 19	25%
Category 20	25%

[REDACTED]

[REDACTED]

3 MR. SCHMIDT: Object to  
4 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

[illegible]



[REDACTED]

20 MR. BOGLE: How much time  
21 have I used?

22 THE VIDEOGRAPHER:  
23 20 minutes.

24 BY MR. BOGLE:

1 Q. I'm going to hand you what  
2 I'm marking as Exhibit 43. Also marked  
3 as 1.1864.

4 (Document marked for  
5 identification as Exhibit  
6 Mahoney-43.)

7 BY MR. BOGLE:

■ ■ ■  
■ ■  
■ ■  
■ ■

12 MR. SCHMIDT: I'm just going  
13 to enter an objection on the  
14 scope. I think this is well  
15 outside the scope of anything that  
16 I did. If I could have a running  
17 objection.

18 MR. BOGLE: He raised the  
19 issue. I wasn't going to go here,  
20 but he raised the issue.

21 MR. SCHMIDT: I still think  
22 it's outside the scope. May I  
23 have a running objection?

24 MR. BOGLE: Sure.

1 BY MR. BOGLE:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Response	Percentage
Yes	65%
No	35%
Don't know	0%

Response	Percentage
Yes, the U.S. should take action to reduce greenhouse gas emissions	92%
No, the U.S. should not take action to reduce greenhouse gas emissions	8%

\_\_\_\_\_

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Age Group	Percentage
18-24	10%
25-34	20%
35-44	30%
45-54	25%
55-64	15%
65-74	10%
75-84	5%
85+	5%

Response	Percentage
Yes	100%

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Response	Percentage
Doing a good job	45%
Not doing a good job	55%

Response	Percentage
Not responsible	10%
Somewhat responsible	20%
Somewhat responsible	30%
Responsible	40%

\_\_\_\_\_

\_\_\_\_\_

Category	Value (approximate percentage of bar length)
1	100%
2	90%
3	60%
4	20%
5	20%
6	80%
7	100%
8	100%
9	90%
10	90%
11	95%
12	60%
13	70%
14	20%
15	20%
16	100%
17	90%
18	60%
19	60%
20	95%
21	90%
22	100%

20 MR. SCHMIDT: Object to the  
21 characterization. Foundation.  
22 BY MR. BOGLE:

Category	Percentage
Yes	85%
No	15%

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12 MR. SCHMIDT: Object to  
13 foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 MR. SCHMIDT: Objection.  
2 Foundation.

3 BY MR. BOGLE:

[illegible]

Age Group	Male	Female	Other
18-24	100%	100%	100%
25-34	100%	100%	100%
35-44	100%	100%	100%
45-54	100%	100%	100%
55-64	100%	100%	100%

7 MR. SCHMIDT: Object to  
8 characterization. Foundation.

Response	Percentage Range
U.S. should take action	75% - 95%
U.S. should not take action	5% - 25%

Age Group	Percentage
18-24	15%
25-34	35%
35-44	45%
45-54	25%
55-64	10%

22 MR. SCHMIDT: Objection.  
23 Characterization.

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 BY MR. BOGLE:

11 Q. Okay. It wasn't absolute  
12 meaning that there was no -- it was up to  
13 the distribution center itself to decide  
14 whether they wanted to fill above the  
15 8,000 level. There was no hard blocking,  
16 right?

17 A. There was no hard blocking.

18 MR. SCHMIDT: Object to the  
19 characterization.

20 BY MR. BOGLE:

21 Q. You were asked about  
22 Exhibit 1.1464, which was Exhibit 1 to  
23 the deposition. It's the September 27,  
24 2006, letter from Mr. Rannazzisi. You



1 again talked about the reference to  
2 potentially blocking orders being new in  
3 this letter. Do you recall saying that?

4 A. Yes.

█ █ █ █

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10 MR. SCHMIDT: Objection.

11 Foundation.

12 BY MR. BOGLE:

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23 Q. Okay. Well, you're familiar

24 with the statistic I believe that's even

1 on McKesson's website that one-third of  
2 all pills distributed in the United  
3 States come from your company, right?  
4 Are you familiar with that stat?

5 A. I'm not sure that I've seen  
6 it on the website. But I know that our  
7 market share is roughly in line with  
8 that.

9 Q. Right. So to say that you  
10 guys at McKesson don't have an impact on  
11 the amount of pills, and specifically  
12 controlled substances that might appear  
13 in any region in this country, is a bit  
14 overstated if you guys, in fact, supply  
15 one out of every three pills in the  
16 United States, right?

17 MR. SCHMIDT: Objection.  
18 Characterization.

19 THE WITNESS: I think that  
20 an expression of our market share  
21 in saying that one out of every  
22 three opioids, I don't see the  
23 linkage there necessarily as cause  
24 and effect.





[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6 MR. SCHMIDT: Objection.

7 Objection. Argumentive.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16 MR. SCHMIDT: Objection.

17 Foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2 MR. SCHMIDT: Objection.

3 Foundation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

16 MR. SCHMIDT: Objection to

17 characterization.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

2

MR. SCHMIDT: Objection.

3

Form.

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[REDACTED]

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[REDACTED]

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MR. SCHMIDT: Objection.

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Argumentive.

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[REDACTED]

[REDACTED]

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[REDACTED]

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[REDACTED]

A horizontal bar chart with 15 rows. Each row consists of a small gray square on the left and a larger gray bar to its right. The bars vary in length and position, creating a fragmented, abstract pattern. The bars are arranged in a way that suggests a sequence or a process, with some bars starting at the same point and others starting at different points. The overall effect is one of a complex, multi-layered structure.

17 MR. SCHMIDT: Objection.  
18 Foundation.

Age Group	Male (%)	Female (%)
18-24	10	10
25-34	20	20
35-44	30	30
45-54	40	40
55-64	50	50
65-74	60	60
75+	70	70



[illegible]

23 MR. SCHMIDT: Objection.

24                      Foundation.    Characterization.

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 MR. SCHMIDT: Objection.

11 Asked and answered.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23 MR. SCHMIDT: Were you --

24 were you finished with your



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[REDACTED]

[REDACTED]

12 MR. SCHMIDT: Objection.

13 Characterization.

14 BY MR. BOGLE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

10 MR. SCHMIDT: Objection.

11 Characterization.

12 BY MR. BOGLE:

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

20 MR. BOGLE: No further

21 questions.

22 MR. SCHMIDT: I just need a

23 minute.

24 THE VIDEOGRAPHER: Off the

1 record, right? The time is  
2 7:46 p.m. Going off the record.  
3 (Short break.)

4 THE VIDEOGRAPHER: The time  
5 is 7:49 p.m. Back on the record.

6 - - -

7 EXAMINATION

8 - - -

9 BY MR. SCHMIDT:

[REDACTED]

17 MR. BOGLE: Object to form.

[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11 MR. SCHMIDT: Thank you.

12 That's all.

13 MR. BOGLE: Got nothing.

14 THE VIDEOGRAPHER: Okay.

15 Stand by, please. This marks the

16 end of today's deposition. The

17 time is 7:50 p.m. Off the record.

18 (Excused.)

19 (Deposition concluded at

20 approximately 7:50 p.m.)

21

22

23

24

1  
2 CERTIFICATE  
3  
4

5 I HEREBY CERTIFY that the  
6 witness was duly sworn by me and that the  
7 deposition is a true record of the  
8 testimony given by the witness.

9 It was requested before  
10 completion of the deposition that the  
11 witness, WILLIAM DE GUTIERREZ-MAHONEY,  
12 have the opportunity to read and sign the  
13 deposition transcript.

14  
15 \_\_\_\_\_  
16 MICHELLE L. GRAY,  
17 A Registered Professional  
18 Reporter, Certified Shorthand  
19 Reporter, Certified Realtime  
20 Reporter and Notary Public  
21 Dated: December 3, 2018  
22  
23  
24

25 (The foregoing certification  
26 of this transcript does not apply to any  
27 reproduction of the same by any means,  
28 unless under the direct control and/or  
29 supervision of the certifying reporter.)  
30  
31  
32

1 INSTRUCTIONS TO WITNESS

2  
3 Please read your deposition  
4 over carefully and make any necessary  
5 corrections. You should state the reason  
6 in the appropriate space on the errata  
7 sheet for any corrections that are made.

8 After doing so, please sign  
9 the errata sheet and date it.

10 You are signing same subject  
11 to the changes you have noted on the  
12 errata sheet, which will be attached to  
13 your deposition.

14 It is imperative that you  
15 return the original errata sheet to the  
16 deposing attorney within thirty (30) days  
17 of receipt of the deposition transcript  
18 by you. If you fail to do so, the  
19 deposition transcript may be deemed to be  
20 accurate and may be used in court.

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4	PAGE	LINE	CHANGE				
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1  
2 ACKNOWLEDGMENT OF DEPONENT

3  
4 I, \_\_\_\_\_, do  
5 hereby certify that I have read the  
6 foregoing pages, 1 - 606, and that the  
7 same is a correct transcription of the  
8 answers given by me to the questions  
9 therein propounded, except for the  
10 corrections or changes in form or  
11 substance, if any, noted in the attached  
12 Errata Sheet.

13  
14  
15 \_\_\_\_\_  
16 WILLIAM DE GUTIERREZ-MAHONEY DATE

17  
18  
19 Subscribed and sworn  
20 to before me this  
21 \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.  
22 My commission expires: \_\_\_\_\_

23 \_\_\_\_\_  
24 Notary Public

Highly Confidential - Subject to Further Confidentiality Review

	LAWYER'S NOTES		
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